

July 30, 2009

NG-09-0539 10 CFR 50.55a

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555-0001

Duane Arnold Energy Center Docket 50-331 License No. DPR-49

Relief Request for 1st Period Limited Weld Examinations

Pursuant to 10 CFR 50.55a(g)(5)(iii), NextEra[™] Energy Duane Arnold, LLC, f/k/a FPL Energy Duane Arnold, LLC (hereafter, NextEra Energy Duane Arnold) hereby requests NRC approval of the enclosed relief request from IWB-2500 to allow performance of limited examinations of various welds. This relief is requested for the Fourth Ten year Interval of the Inservice Inspection Program for the Duane Arnold Energy Center (DAEC), which ends on February 21, 2014. Enclosure 1 of this letter contains the request for relief and Enclosure 2 contains the 1st period nondestructive evaluation reports associated with the components for which relief is sought.

NextEra Energy Duane Arnold requests approval of this request by the end of December 2009.

If you have any questions, please contact Steve Catron at (319) 851-7234.

Richard L. Anderson Vice President, Duane Arnold Energy Center NextEra Energy Duane Arnold, LLC

Enclosures

cc: Administrator, Region III, USNRC Project Manager, DAEC, USNRC Senior Resident Inspector, DAEC, USNRC



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Enclosure 1

10 CFR 50.55a REQUEST IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii) INSERVICE INSPECTION IMPRACTICALITY

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10 CFR 50.55a REQUEST IN ACCORDANCE WITH 10 CFR 50.55a(g)(5)(iii) INSERVICE INSPECTION IMPRACTICALITY

Component Identification

Class 1
ASME Code, Section XI, Subarticle IWB-2500
Table IWB-2500-1
B-A, R-A
B1.40, and R1.16
Reactor Vessel Head-to-Flange Weld, and Piping Welds.
See Table A for Component Identification

Applicable Code Edition and Addenda

ASME Section XI 2001 Edition, 2003 Addenda

Code Requirement

Section XI (2001 Edition with the 2003 Addenda), Subarticle IWB-2500 states in part "Components shall be examined and tested as specified in Table IWB-2500-1." Table IWB-2500-1, Category B-A, Item B1.40, requires a volumetric examination of applicable Class 1 pressure retaining welds, which includes essentially 100% of weld length once during the ten year interval.

Relief Request NDE-R005 was approved on January 31, 2007 allowing the use of Risked Informed (RI) Inservice Inspection (ISI) for Class 1 and 2 welds. This relief request states that the original list of intended credited Class 1 welds may have been substituted on specific occasions with similar welds due to accessibility issues that would have resulted in reduced exam volumes. NextEra Energy Duane Arnold chooses welds for examination that are classified within the same risk matrix classification segment, using the same treatment criteria as those originally selected.

Reason for Request

The Duane Arnold Energy Center (DAEC) construction permit was issued in 1970 and the operating license was issued in 1974. The reactor vessel was designed and installed to ASME Section III, 1965 Edition, with the Summer 1967 Addenda. The parameters for accessibility for ISI were not requirements at that time and therefore were not necessarily factored into component and system configurations, thereby creating conditions where ASME Section XI Code required examination coverage of Class 1 welds cannot be obtained. 10 CFR 50.55a recognizes the limitations to in-service inspection of components in accordance with Section XI of the ASME Code that are imposed due to early plants' design and construction, as follows:

10 CFR 50.55a(g)(1): For a boiling or pressurized water-cooled nuclear power facility whose construction permit was issued prior to January 1, 1971, components (including supports) must meet the requirements of paragraphs(g)(4) and (5) of this section to the extent practical.

10 CFR 50.55a(g)(4): Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) which are classified as ASME Code Class 1, Class 2, and Class 3 must meet the requirements, except design and access provisions and pre-service examination requirements, set forth in Section XI of editions of the ASME Boiler and Pressure Vessel Code... to the extent practical within the limitation of design, geometry and materials of construction of the components.

10 CFR 50.55a(g)(5)(iii): If the licensee has determined that conformance with certain code requirements is impractical for its facility, the licensee shall notify the Commission and submit, as specified in § 50.4, information to support the determinations.

Exam	Item	Component	Period	Code	Description
Category	Number	Number	Examined	Coverage	
B-A	B1.40	HCC-C001	1	76.05%	Reactor Vessel Head-to-
					Flange Weld
			1	50%	Reactor Water Cleanup
R-A	R1.16	COA-3024	1	50%	Piping Weld
			1	50%	Recirculation Manifold to
		RIVIA-J004	ł	50%	Riser Piping Weld

Table A - Limited Exam Weld List

Reactor Vessel Head to Flange Weld – HCC-C001

This weld is the Head to Flange Weld which can only be examined from the head surface. The examination is limited to approximately 76.05% and is limited due to the configuration of the weld. Note that this weld examination is divided up into thirds, with each third being examined each period. The examination completed was from Stud Holes 60 to 20. There is no feasible option in order to examine the remaining 23.95%.

The Nondestructive Examination (NDE) procedure used for this examination incorporates the examination techniques qualified under Appendix VIII of the ASME Section XI Code by the Performance Demonstration Initiative (PDI). That procedure was approved under Relief Request NDE-R008 on January 31, 2007.

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Reactor Water Cleanup Class 1 Weld CUA-J024

This weld is between a containment penetration and a motor operated valve (MO-2701). The valve side of the weld is not accessible for scanning due to geometry. This weld is the only weld in the risk segment (CU-007) so there is no other weld to select. The consequence evaluation determined this weld to be high because it is the weld between the containment and the isolation valve (MO-2701). The material for the items welded together is A182 F316 forging penetration to an A351 CF8M cast valve. Per Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," "Inspection Schedules" position (2), this weld would be considered in the Intergranular Stress Corrosion Cracking (IGSCC) Category A. The A182 F316 is solution heat treated which is an acceptable process for resistance to IGSCC. The staff position states:

"Although castings with higher carbon content than 0.035% are not considered to be resistant to sensitization, welds joining such castings (in the form of pump and valve bodies) to piping have been relatively free of IGSCC. This may be attributed to a favorable residual stress distribution, as calculations have indicated. For this reason, weld joining resistant material to pumps and valves will be considered to be resistant welds, and included in IGSCC Category A. If extensive weld repairs were performed the residual stress may be unfavorable, in which case such welds should be included in Category D."

Therefore, this weld is considered resistant to IGSCC. The volume examined was from the A182 F316 penetration side of the weld. The weld was not examined from the A351 CF8M cast valve side due to the configuration of the valve (see photo that follows).



Since this weld is resistant to the degradation mechanism of IGSCC and there is no other degradation mechanism that has been identified for this weld, the volume examined is acceptable.

Recirculation System Class 1 Weld RMA-J004

This weld is the branch connection of the recirculation manifold to the recirculation riser line. The manifold side is not accessible for scanning due to geometry. There are a total of eight welds with this configuration (8 recirculation risers coming off the two manifolds); see ISI Isometrics 1.2-20 and 1.2-22 that follow.

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The detailed configuration of the branch connection weld provided below is taken from the construction drawing (B31-G001-RD-N-B3). As the configuration shows it does not allow an examination to be performed from the manifold side.



All eight manifold to riser welds were solution annealed which is an acceptable process for resistance to IGSCC. Each weld was identified in its own risk category so there is no other weld that could be selected to obtain a higher examination coverage. These welds were determined to have Thermal Transients as a degradation mechanism under the RI-ISI Program. The Degradation Mechanism Evaluation Document (M453-047) states:

For the most part, the RCR System heats up and cools down slowly and uniformly so it is not susceptible to the thermal shocks that result in TT degradation mechanism. However, at the beginning of shutdown cooling, the RCR System does receive a double-shock from the RHR System (cold fluid and then hot fluid into formerly hot lines). The double-shock was analyzed for the RCR main loop discharge, manifold, and riser piping. The results indicate that all of these pipe segments are potentially susceptible to the TT degradation mechanism.

NextEra Energy Duane Arnold proposes to perform the ultrasonic examination on one more of the eight welds (which would only receive 50% coverage) in lieu of performing the examination on just one weld. One weld will be examined from each loop.

Performing two of the eight welds (each receiving 50% coverage) is considered an acceptable alternative.

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Proposed Alternative and Basis for Use

In accordance with 10 CFR 50.55a(g)(5)(iii), relief is requested for the components listed in Table A on the basis that the required examination coverage of "essentially 100 percent" is impractical due to physical obstructions and the limitations imposed by design, geometry and materials of construction. NextEra Energy Duane Arnold performed qualified examinations that achieved the maximum, practical amount of coverage obtainable within the limitations imposed by the design of the components.

Additionally, for the Class 1 examination Category B-P, a VT-2 examination is performed on the subject components of the Reactor Coolant Pressure Boundary during system pressure tests each refueling outage. The examination was completed during the 2009 refueling outage and no evidence of leakage was identified for these components.

Based on the above, with due consideration of the earlier plant design, the underlying objectives of the Code required volumetric examinations have been met. The examinations were completed to the extent practical and no evidence of unacceptable flaws was detected. VT-2 examinations performed on the subject Class 1 components during system pressure testing each refueling outage (in accordance with examination Category B-P) provide continued assurance that the structural integrity of the subject components is maintained. Additionally, the DAEC Water Chemistry Program and inerted primary containment environment provide added measures of protection for the component materials.

Duration of Proposed Alternative

Relief is requested for the Fourth Ten year Interval of the Inservice Inspection Program for the DAEC, which ends on February 21, 2014.

Precedents

- NRC Letter dated May 1, 2008, "Safety Evaluation for Request for Relief from IWB-2500 and IWC-2500 Requirements to Allow Performance of Limited Examinations of Various Welds for the Third 10-Year Interval of the Inservice Inspection Program (TAC No. MD5669)."
- NRC Letter dated October 18, 1999, "Safety Evaluation of Third 10-Year Interval Inservice Inspection Program Plan Requests for Relief for Duane Arnold Energy Center (TAC No. MA4151)" specifically for Relief Request NDE-R028.
- 3) NRC Letter dated March 23, 1998, "Evaluation of Third 10-Year Inservice Inspection Interval Program Plan Requests for Relief for the Duane Arnold

Energy Center (TAC No. M95412)" specifically for Relief Requests NDE-R006, NDE-R007, NDE-R008, NDE-R009, and NDE-R010.

References

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None

Enclosure 2

1st Period Non-Destructive Evaluation Reports

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Component ID:	HCC-C	001						Size/Leng	gth:	N/A	Thic	kness/Diame	eter:	3.93	14
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UT Vessel Examination



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Supplemental Report

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Examiner:	N/A	Level:	N/A	Site Review:	Dohmen, Frank E.	FED		Date:	2/2:	7/07
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Additional - Supplemental Reports

Supplemental Report

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Comments: COVERAGE CALCULATIONS

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Sketch or Photo: U:\Apps\DAECDB\EROC\RFO20\REPORT SUPPLEMENTS\UT\SN_3300 CompID_HCC_C001 Report_UT_07_100 CovCalc.jpg

RPV Coverage Calculation Sheet

Note: calculations performed using 2D plot only

Component ID HCC-C001

Area regulred to be examined

Axial scan direction: Height x width

3.93 inches x 5.3 inches equals 20.829 square inches

Parallel scan direction: Height x width

3.93 inches x 5.3 inches equals 20.829 square inches

Actual area examined

50 decree R L Axial scan direction: Height x	elat	on: He	n directio	scan	Axial	R 1	teoree	60
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3.93 Inches x 5.3 inches equals 20.829 square inches

Triangular area not examined (if applies) 1.53 x .5 x 2.92 height equals 2.2338 square inches Base

Axial scan direction area examined 18.5952 square inches

60 degree R.L. Parallel scan direction: Height x width

3.93 inches x 3.33 inches equals 13.0869 square inches

Additional Inner 15% area achieved using 40 & 45 degree shear techniques: Helght x width (Nozzle to RPV only)

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U Inches	x		Inches	equals		square inclues	

Combining all scan directions: <u>31.6821</u> square inches for total exam

Divide area examined by required area: equals coverage achieved 76.05 % coverage for total exam

Calculations performed by:	Todd Blechinger	Level	<u>111</u>
DAEC Review	Frank Dohmen	Level	
ANII Review	Jeramy Bowers		

Additional - Supplemental Reports

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UT Calibration/Examination

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Results:	Accept	Reje	ct 🗌	Info 🗌						Co	mments: Se	e supplei	mental she	et for thickne	ss and cor	ntour and
Percent Of Cove	arage Obtained	i > 90%:	50%	Review	ved Previous	Data:	Yes					aci aĝe hi				
Examiner	Level	I-PDI		Signature			Date	Review	ver	1			Signat	ure		Date
Davis, Layn R.			\mathcal{A}	12			2/8/2009		-17W/4	y inter	6, S.W.	\frown		~		2/11/09
Examiner	Level []	-PDI		Signature			Date	Site R	eview	t -		7	Signat	upe)		Date
Tolosky, Ryan	J.		al	113	44		2/8/2009				\sim	+ lu	h ()	timen		2/13/09
Other	Level N	VA		Signature			Date	ANII F	leview				Signat	ure		Date
N/A								-Yer	eny B	one	<u>ا</u>		SN	<u> </u>	ð	1-1409

UT Calibration/Examination

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UT Calibration/Examination



Supplemental Report

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							Report No.:	<u></u> UT	-09-00)6
						_	Page:	3	of_	3
Summary No.:	117900-RI				(ALLA			1	
Examiner:	Davis, Layn R.		Level:	III-PDI	Reviewer:	STAN 4 HA	Ka, S.W.	Date:	4	A
Examiner:	Tolosky, Ryan J.		Level:	II-PDI	Site Review:	filmh 1	:Gm	Date:	3/13	<u>709</u>
Other:	N/A		Level:	N/A	ANII Review:	276		Date:	2-14	109
Comments:		and the second secon	Flow	·····	X			<u>a de la companya de </u>		
		. Ś.	2	15						
		· ^ ·				15				
	Mari fold	I	& 1	1		1	Redi	icer		
	V									
		•								
		·	4							
	Manifold			45° 160° R L	-	45°	Redu	cer-		
	· ·		7			1.				
		//			/					
			Ĩ				<i>\[</i>		Area	of
		-	•				μ.c.			-ye
					50%	Coverage				

Ø					UT C	alibratio	on/Exar	ninatio	n						
FPL Energ	av Site	e/Unit:	DAEC	1	1		Proce	edure:		ACP1211.20			Outage	No.: F	RFO-20-1
DONDS AFROID EN	Summar	ry No.:		74600-RI		-	Procedure	Rev.:		6			Report i	No.: L	IT-07-028
	Works	scope:		ISI		_	Work Orde	r No.:		1135836			Pa	age: 1	of 2
Code:	ASME	2001 Ed	thru 2003 Add		Cat./I	tem;	R-A/R1.16	-4		Location:			RB270		
Drawing No.:		1.:	2-11A SHT-01			Description:	PIPE - MOT	OR OPERA	TED G	ATE –					
System ID:	cu														
Component ID:	CUA-J024		<u> </u>		<u> </u>				Size/	Length: .	90" / 15.7	5"	Thickness/Dia	ameter: .	58" / 5.0" OD
Limitations:	Single sided	exam du	e to valve conf	iguration,						Star	t Time:	1400	Finisl	h Time:	1415
	Instrument	Settings	5		Sea	arch Unit		Cal		D-4		Avia	Orientated S	earch Linit	· · · · · · · · · · · · · · · · · · ·
Serial No.:		01LCE	BL	Serial No.	:	01D4NY		Checks	Time	Date	Calib	ration	Signal	Sween	
Manufacturer:		Krautkra	amer	Manufactu	irer:	КВА		Initial Cal.	0735	2/12/2007	Ref	ector	mplitude %	Division	Sound Path
Model:		USN 60	SW	Size:	.375"	Shape:	Round	Inter. Cal.	1400	2/12/2007	1" N	lotch	80	8.0	1.43"
Delay:	0/5.30 F	Range: _	1.850"	Freq.:	1.50 MHz	Style:	Comp-G	Inter. Cal.	1415	2/12/2007	N	/A			
M'tl Cal/Vel:	.1223 F	Pulser:	Square	Exam Ang	le: 45°	" # of Elem	ents: Single	Final Cal	1510	2/12/2007					
Damping:	<u>500Ω</u> F	Reject:	0%	Mode:		Shear		1 mai Oal.			' -				
Rep. Rate:	AutoHigh P	req.: _	2.0 MHz	Measured	Angle:	45°			Coupla	nt					
Voltage		Node:	Fullwave	Wedge St	yle:	MSWQC	;	Cal. Batch:		06225		Circumter	ential Urienta	ted Search	
Ax Gain (dB)	C	irc Gain	(dB): 23		Soarch	Linit Cable		Type:	Sond	gei li	Calib Refl	ration actor /	Signal Mplitude %	Sweep Division	Sound Path
10 Screen Di	$\frac{1.850}{1}$ ir	n of	Sound Path	Type:	Dealth	RG-174			3011		N	/A			
Linearity Report	No -	"" ""	7_001	Length:	6'	No. Conn.:	0	Exam Batci	1: 11)tra	06225					
	Calibration	Block			Scan	Coverage		Mfg.:	Sonc	otech					
Cal. Block No :	Calibration	5539		Upstream (Downsi	tream 🗔 Sca	n dB: 37			·······		Dof		én a Dia air	
Thickness	5"-2.0" [Dia.:	Flat	CW [<u> </u>	CCW 🔽 Sca	in dB: 37	Refe	rence E	Block	Gain	Reit	Signal	Sweep	
Cal. Blk. Temp.	78° Temp. T	ool:	253987	Exam Surf	ace:	OD		Serial No.:	L	MT-032	dB	Reflector	Amplitude %	Division	Sound Path
Comp. Temp.;	78° Temp, T	ool:	253987	Surface Co		Blend		Туре:	SS Ro	ompas	23	SDH	18	5.8	1.05"
Recordable Ind	ication(s):	Yes	N₀ 🔽	(If Yes, Ref.	- Attached L	Iltrasonic Indic	ation Report.) .)			N/A				
Results:	Accept 🔽	Rejec	t 🗋	Info					Co	mments: No	downst	eam scan:	s due to valve	configura	tion.
Percent Of Cove	rage Obtained	> 90%:	50%	Reviewed	Previous D	Data:	Yes			60	° angle re	ported on	UT-07-029		
Examiner	Level III-P	PDI	2 -	Signature			Date Review	ver		6110	-1/	Signat	ure		Date
Davis, Layn R		/	Xlls	\mathcal{O}		2/12/2	007 Blechi	nger, Todd	P	INP.	BLIK			· _	3/4/07
Examiner Rollock Norm	Level 1			Signature]	Date Site Re	eview		4	The who	(Signat	ure	3/	Date
Other				Cionatura	<u> </u>	2/12/2	Donm	en, Frank E			(· • (/0/
N/A	Level N/A			orginature	•	L		s jeremv			12	Signat	116	2.5	Date
UT Calibration/F	xamination										59				0

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UT Collibration/Examination

Marine and a second sec	Supplemental Report							
FPL Energy					Report No.:	<u> </u>	T-07-0	28
					Page:	2	of	2
Summary No.:	74600-RI				0			
Examiner:	Davis, Layn R _ AND	Level: III-PDI	Reviewer:	Blechinger, Todd P.	JP0	Date:	31.	1107
Examiner:	Pollock, Norm E.	Level: I	Site Review:	Dohmen, Frank E.	FED	Date:	315	107
Other:	N/A	Level: <u>N/A</u>	ANII Review:	Bowers, Jeremy	<u>33</u>	Date:	3-	5-57

Comments: Actual configuration penetration fitting to valve. 50 % code coverage due to single sided access. *Actual diameter 5.0", actual weld length 15.75"

Sketch or Photo: U:\Apps\DAECDB\EROC\RFO20\REPORT SUPPLEMENTS\UT\SN_74600-RI CompID_CUA-J024 Report_UT-07-028 Coverage Plot.jpg

SYSTEM: <u>LUCL</u>					COMPONENT ID NO .: CUA - JC-24					
POSITION	0.	80*	180*	278*						
1	1.0"									
2	.68"			Z	CROWN WIDTH:					
3	58		N'A							
4	40"									
5	NUN				WELD LENGTH: 14.5					

50°% CODE COVERAGE DUE TO SINGLE SIDED ACCESS



Additional - Supplemental Reports

Ø					UT	Calibrati	on/Exa	minatio	n							
FPL Energy Site/Unit:		DAEC / 1			Procedure:		ACP1211.20			Outage No.:		RFO-20-1				
Summary No.:			74600-Ri			Procedure	Rev.:		6			Report	No.: L	UT-07-029		
Workscope:			ISI			Work Order No.:		1135836		-	P	age: 1	of 1			
Code: ASME 2001 Ed thru 2003 Add				Cat./Item: R-A/R1.16-4			j-4		Location:		RB270					
Drawing No.:		1	.2-11A SHT-01		_	Description	PIPE - MO	TOR OPERA	- TED G/	ATE -						
System ID:	cu			• · ·												
Component ID:	CUA-J024								Size/	ength: .	90" / 15.75	5"	Thickness/Di	ameter: 0.	580" / 5.0" OD	
Limitations:	Single sideo	d due to	valve configurat	ion	<u> </u>		······································	· · ·		Star	t Time:	1416	Finis	h Time:	1422	
	Instrument Settings Search Unit							Cal				A	al Oriontatod 6	Contract I and		
Serial No.:		01LC	BL	Serial I	No.:	05-335		Checks	Time	Date	Calib	AXI	Sized	Succes	1	
Manufacturer:		Krautkr	amer	Manufa	acturer:	RTD		Initial Cal.	0720	2/12/2007	Refie	ector	Amplitude %	Division	Sound Path	
Model:	<u></u>	USN 6	SW	Size:	2 (7x10 m	m) Shape:	Rect	Inter. Cal.	1416	2/12/2007	1" N	otch	80	7.0	2.04"	
Delay:	0/7.050	Range:	3.0"	Freq.:	2.0 MHz	Style:	TRL2	Inter, Cal.	1422	2/12/2007	N	/A				
M'tl Cal/Vel:	.2304	Pulser:	Square	Exam /	Angle: <u>6</u>	0° # of Eler	nents: Dual	Final Cal	1505	2/12/2007						
Damping:	500Ω	Reject:	0%	Mode:		Shear		Final Gal.	1505	2122001	·					
Rep. Rate:	AutoHigh	Freq.:	2.00 MHz	Measu	red Angle:	601	· · · · · · · · · · · · · · · · · · ·		Couplai	nt					L	
Filter:	Fixed	Mode:	FullWave Wedge Style: N/A					Cal. Batch:		06225	·	Circumfe	cumferential Orientated Search Unit			
Ax. Gain (dB):	450 Other: PulseWidth 250 hs 58 Circ. Gain (dB): 58 Search Unit Cable					lype: Mfor.:	Ultra	gel (i otech	Calib Refle	ration ector	Signal Amplitude %	Sweep Division	Sound Path			
10 Screen Div = 3.0 in of Sound Path Type: RG-174					Evam Bata		06036	N	A		*******					
Linearity Report	t No ·	 -(07-001	Length	: 6'	No. Conn.:	0	O Type: Ultracel II								
			Sca	can Coverage Mío.:			Sonotech									
Calibration Block						and B· 64								L		
Thickness 5" 2 0" Dia : 5lat			c	W T		an dB N/A	N/A Reference Block Reference/Simul			Signal	Sween					
Cal Blk Temp	78° Temp	Tool:	253987	 Exam S	Surface:	00		Serial No .:	L	MT-032	dB	Reflecto	or Amplitude %	6 Division	Sound Path	
Comp. Temp.	78° Temp.	Tool:	253987	Surface	- Condition:	Bien		Туре:	SS Ro	ompas	48	SDH	60	45	1.43"	
Recordable inc	lication(s):	Yes		(if Yes. R	Ref. Attached	Ultrasonic Indi	cation Report				N/A			<u> </u>		
Results: Accept Reject Info Comments: No downstream scans due to valve configuration.									tion.							
Percent Of Coverage Obtained > 90%: 50% Reviewed Previous Data: Yes Reference Coverage plot on 45° angle report# UT-07-028.																
Examiner	Level III.	PDI		Signature			Date Revie	wer				1 Signa	iture.	<u> </u>	Date	
Davis, Layn R 2/12/2007					2007 Blech	Blechinger, Todd P.					BUT		2/4/07			
Examiner Level Signature Date				Date Site R	Review				Sign	Signature / / Date						
Pollock, Norm E. 2/12/2007					2007 Dohm	ien, Frank E	Frank E. Wold				Doymy 3/5/07					
Other	Level N/A Signature			··	Date ANII F	eview				Signature Date						
N/A						Bowe	rs, Jeremy				B			4507		
LIT Calibration/E	Evamination															