From: CLARK, ROBERT W
To: Wang, Alan
Subject: RE: ANO 2 TACs ME8270 and ME8275
Date: Wednesday, September 19, 2012 11:53:20 AM

Alan, this is one of those relief requests that historically is filed within one year after the conclusion of an interval. Let me try to explain.

Welds 03-005, 03-006 & 03-007 were volumetrically examined in 2003 to satisfy the 3rd ISI interval compliance requirements of IWB-2500, Table 1. The NDE procedure was written to the ASME Section XI 1986 code. These were the Nozzle to Extension Piece welds on the then new "A" steam generator. They were scanned from the extension piece side only resulting in 50% coverage of the code required examination volume. This exam, at the time, was compliant with the procedures and the code of record.

In 2006 we examined welds 04-005, 04-006 & 04-007. These 3rd ISI interval examinations were for the "B" steam generator Nozzle to Extension Piece welds (sister welds to the 03-xxx welds). They were volumetrically examined in accordance with ASME Section XI, 1995 ed. w/96 ad.. These welds were scanned from both sides of the weld and additional code coverage was achieved. However, since essentially 100% of these welds could not be examined either, they were included in ANO2-R&R-008 also.

All of the above welds were only examined once during the 3rd interval and no relief requests previous to ANO2-R&R-008 were submitted for limited examination coverage.

Please let me know if you or the reviewer has additional questions concerning this relief request.

Bob

From: Wang, Alan [mailto:Alan.Wang@nrc.gov]
Sent: Thursday, September 13, 2012 10:32 AM
To: CLARK, ROBERT W
Subject: FW: ANO 2 TACs ME8270 and ME8275

Bob, good talking to you again. Here is the email from the reviewer for Isi-008. Let me know if you need a call to discuss. Alan

From: McLellan, Thomas
Sent: Monday, September 10, 2012 2:12 PM
To: Kalyanam, Kaly
Subject: ANO 2 TACs ME8270 and ME8275

> I need some clarification in the license's RAI response dated Sept 4, 2012 below. The way I read it for RR ANO2-ISI-008 the licensee is requesting relief for the examinations performed during 2003. That they must have examined essentially 100% of the subject welds in 2006 because they performed scans down the taper in 2006 as it was not required in 2003. Is this a correct interpretation? Also, if they did not obtain essentially 100% of the subject welds in 2006 and they submitted a relief request proved the date of the letter and SE if any was provided by NRC. Thks Tom

Additional information provided by the licensee for RR ANO2-ISI-008 for components in Table 1 contained in the licensee submittal dated March 26, 2012, identified as Numbers 03-005, 03-006, and 03-007 associated with Figures 5, 6, and 7. (as stated)

> The limitation is due to the configuration on the nozzle side of the component. These examinations were performed in 2003. During that time, the vessel weld ultrasonic examination procedure did not specifically require scanning down a nozzle taper in a best effort attempt to enhance coverage; therefore; scanning was only credited from a single side, e.g., 50 [percent.]
>
> The Figures 5, 6, and 7 contained in the Request for Relief ANO2-ISI-008 are typical of the examination scans performed in the 2006 inspection and depict scans down the nozzle taper.
>
> Those scans down the nozzle taper were not performed in 2003 on components 03-005, 03-006 and 03-007.
>
> During the development of the response to this request it was determined that Request for Relief ANO2-ISI-008, Figures 5, 6, and 7 were incorrect. They were actually a copy of earlier figures in the same request. The correct figures are shown below and are typical of the examination scans performed in the 2003 time frame.