

Activities That May Impact Inservice Inspection Plans

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

1. Review repair/replacement plans for code repair/replacement activities
2. Review repair/replacement work packages associated with planned modifications prior to work being performed
3. Review completed NIS-2 Forms for repair/replacement activities
4. Perform periodic reviews of work packages associated with plant maintenance activities
5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

Mike Blew:

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

1. Review repair/replacement plans for code repair/replacement activities

Yes. The R/R coordinator screens for ISI impact, if impacted, forwards the activity to the ISI coordinator. The ISI Coordinator generates an NTM via Passport for tracking. The ISI Coordinator and the R/R coordinator are back-ups to each other and are seated next to each other, aiding in the review process.

2. Review repair/replacement work packages associated with planned modifications prior to work being performed

Yes. See Question 1.

3. Review completed NIS-2 Forms for repair/replacement activities

Yes. It is included in the NIS-1.

4. Perform periodic reviews of work packages associated with plant maintenance activities

Only if there is a scope change.

5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

Yes. We are tied thru configuration management for all drawings that impact the ISI Program.

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

When there is an impact to the ISI Program that requires additions/deletions or adjustments, we utilize the NTM process from PassPort. This ensures the change is identified by a tracking system for incorporation. We utilize IDDEAL software suite for our ISI Program/Plan and our implementation process for changes to the Program/Plan are tied by Summary Number, as is the tracking action for the change, thereby providing the link for the paper trail. If the change is cancelled (MOD not implemented) the NTM is used to close out the pending change to the Program.

Roy Blyde:

That is quite simple to answer from a Sizewell B perspective.

All such changes are required to go through our "Engineering Change" process. One of the "check boxes" in this process is "Does this affect ASME Plant items" and a tick in this box ensures all such modifications come via the ISI Group. As the Station welding, NDE, ASME specialist assessor, I review these changes for any impact. So this answers 1 to 4. As for item 5, any such drawing/document changes are required to be linked to the Engineering Change. The ISI Classification Boundary drawings are owed by us so we have to approve any changes.

Hien Do:

The site ISI Program Owners are responsible for identifying activities that could change Class 1, 2, 3, MC/CC configuration. Work Orders/Packages coded as Section XI are routed to them prior to and following works are

completed. So, essentially they perform activities 1 - 5 as described by being in the loop of processing Section XI work packages.

George Fechter:

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

1. Review repair/replacement plans for code repair/replacement activities

During implementation of a design change, impact review forms are completed for each department for determination of the impact upon their area of responsibility. For ISI, I would review the activity to see if any welds/components specifically scheduled in the ISI Plan are being affected. This may lead to alternate welds being selected or performance of the ISI exam for the impacted weld upon welding in the new piping/valve/component. Since I'm both ISI and R&R Coordinator, this is a convenient review.

2. Review repair/replacement work packages associated with planned modifications prior to work being performed

Reference response to Question 1.

3. Review completed NIS-2 Forms for repair/replacement activities

No, I wouldn't normally review completed NIS-2A's (we use N-532-4). But if there was a question about what change was made in the past, old work orders and their respective R&R plans and weld process sheets may be reviewed.

4. Perform periodic reviews of work packages associated with plant maintenance activities

If a work order is being performed on a component/piping within the Section XI Boundary, it would be reviewed to see if it was going to perform a R&R applicable activity. If it's not R&R applicable, I would not normally be concerned with it.

5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

If there was going to be such a change, when the P&ID drawings got updated, the respective Section XI Boundary drawings would get updated. The Section XI Boundary drawings are essentially "cleaned

up” P&ID’s which only show components/piping within the Section XI Boundary.

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

I can’t think of anything else. The above points seem to cover it all.

Richard Gimple

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

1. Review repair/replacement plans for code repair/replacement activities

Yes

2. Review repair/replacement work packages associated with planned modifications prior to work being performed

Yes

3. Review completed NIS-2 Forms for repair/replacement activities

Yes (as part of final R/R Plan package)

4. Perform periodic reviews of work packages associated with plant maintenance activities

No. However, Work Orders have required fields for identifying ASME Code Classes and for identifying that the work is governed by ASME Section XI, which key appropriate reviews of the Work Orders.

5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

No. Engineering Change Packages have screening and applicability forms that require coordination with ISI Engineer before the Change Package is issued for changes that could affect the ISI Program.

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel

responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

Procedure revision form also has required field to identify if the ISI Engineer needs to review the procedure changes for impact on the ISI Program.

Dan Lamond:

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

1. Review repair/replacement plans for code repair/replacement activities

Yes. The ISI or R/R Code engineer (depending on how the specific site is staffed) either holds responsibility for generating or reviewing Section XI repair/replacement plans.

2. Review repair/replacement work packages associated with planned modifications prior to work being performed

Yes. The ISI or R/R Code engineer (depending on how the specific site is staffed) is plugged into the design change and/or engineering change processes in such a way that the ASME ISI Classifications as well as the preservice and post maintenance inspection and testing requirements are either provided or reviewed by a qualification Section XI engineer prior to the package being approved for installation, and they typically must sign off on the package.

3. Review completed NIS-2 Forms for repair/replacement activities

Yes. The ISI or R/R Code engineer (depending on how the specific site is staffed) either holds responsibility for generating or reviewing NIS-2 Forms and signing off on the Summary Report submittal including the NIS-1 or OAR-1 Forms.

4. Perform periodic reviews of work packages associated with plant maintenance activities

Only if the plant maintenance activity effects a Code activity (e.g., disassembly of a component potentially requiring exam under Section XI) or Code required submittal (e.g., OAR).

5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

Yes. But typically the review comes prior to the drawing release and is a hold point or sign off to assure the impacts on the ASME ISI Classifications are addressed prior to release of the new drawing as well as to allow for initiation of other required changes to the ISI Program.

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

- A. If implementing risk informed, new PRA model revisions need to be assessed periodically for impact on risk category rankings. This does not impact the ISI Classification, but it does impact the living program risk groupings and subsequent element selections.**
- B. As built isometric and/or ISI isometric drawings are another place to catch potential changes to the ISI Classifications, but these are typically picked up on the ADLs for items 1 and 2 above.**

Doug Ramey:

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

1. Review repair/replacement plans for code repair/replacement activities

Yes. The responsibility for these activities is within the same group (Code Programs) that is responsible for the ISI Program. No ASME repairs are performed without approval of Code Programs.

2. Review repair/replacement work packages associated with planned modifications prior to work being performed

Yes. The plans are prepared by the same group that is responsible for the ISI Program.

3. Review completed NIS-2 Forms for repair/replacement activities

Yes. At the end of each refuel outage the ISI Engineer reviews each NIS-2 that was issued for any changes to the ISI Program. This is a recurring "Action Request" in our work activity control.

4. Perform periodic reviews of work packages associated with plant maintenance activities

No.

5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

Yes. This review is performed when a revised 10 year plan is prepared. See Question 2 for what is done during the interval.

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

By procedure any change to an ASME Section III component (We are a Code Plant. Our containment vessel is stamped MC) requires that change to be evaluated for ASME Section XI impact. Part of the change process involves preparing a Section XI change notice. A notice is also prepared for changes that affect our IST program. These notices are then entered into our configuration control system as a change against either the ISI Program or the IST Program. Both of these Program Plans are controlled documents. When the program is revised these change notices are closed. To answer Question 1.5, if a system or boundary change is made on the P&ID it is considered a design change and goes through this process.

Rick Swayne:

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

Most of the utilities I have worked with route all work packages on items within the Section XI boundaries through the ISI Coordinator, so that potential effects on the ISI Program can be evaluated. This review is conducted before the work is performed.

I know of one case where maintenance work was done without ISI review and a required visual examination was not scheduled. It cost the utility a lot of consternation. They finally concluded that the normal maintenance exams were performed by a qualified visual examiner and could be credited for the Code-required exam, but, in the meantime, they had a valid concern that they might have had to shut the plant down to perform the missed exam. (I can give more detail on this event if you need it.)

Ken Thomas:

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

We have established administrative controls so that any repair/replacement activities to Class 1, 2, 3 or MC components are reviewed by us. We also have similar controls for design changes.

1. Review repair/replacement plans for code repair/replacement activities

Yes, including ANII review.

2. Review repair/replacement work packages associated with planned modifications prior to work being performed

Yes, as part of 1 above.

3. Review completed NIS-2 Forms for repair/replacement activities

Yes, includes ANII review and submittal to NRC.

4. Perform periodic reviews of work packages associated with plant maintenance activities

No, other than 1 above.

5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

No. If a design change would affect a boundary, we would be contacted.

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

We have done training on code requirements for Engineers and Work Planners. We had to do additional training for procurement personnel to ensure we got to review repair/replacement activities performed off site.

Rick Wehry:

Question 1: Do you perform any of the following activities to identify changes to Class 1, 2, 3, MC/CC components that could impact your current and future inservice inspection plans (including pressure testing plans)?

1. Review repair/replacement plans for code repair/replacement activities

ISI has a sign-off on the Code Repair/Replacement form for review of NDE requirements and any ISI Program impacts.

2. Review repair/replacement work packages associated with planned modifications prior to work being performed

Our modifications program process procedurally requires notification of the ISI Program Engineer (via a Design Considerations Action Sheet) for any mod affecting Code piping and components.

3. Review completed NIS-2 Forms for repair/replacement activities

Because we programmatically perform reviews via 1. and 2. above, Item 3. would be a duplication at our site.

4. Perform periodic reviews of work packages associated with plant maintenance activities

Work packages affecting Code piping and components (e.g., valves) require notification of ISI. Also, any repair work package affecting Code components requires generation of the Code repair form, which is covered by Item 1 above.

5. Perform periodic reviews of as-built drawings releases for P&ID drawings to identify system classification and system boundary changes

For Susquehanna, we have controlled ISIM drawings, which are ISI-scoped P&ID's. Any change to a P&ID automatically 'flags' the associated ISIM drawing for evaluation/impact of change by ISI.

Question 2: What methods other than those described in Question 1 do you use to identify changes to Class 1, 2, 3, MC/CC components so that personnel responsible for your inservice inspection program can evaluate what effect these changes have on your inservice inspection plans?

There are no other methods used for identifying component changes, however, since Susquehanna has a Risk-Informed ISI (RISI) Program, any changes made to the plant PRA model are 'flagged' by Plant Analysis' procedure and an action item is issued to ISI to evaluate any potential impacts to the RISI Program.

Ray West:

I have done all these things in the past at one time or another except for #4, but I am not directly responsible for these activities now. I will send these questions to the R/R Program Owner and the ISI Coordinator so that you can get their input at least for the Millstone Units.

Kevin Whitney:

I will start by answering Question 1, topic 4 since this doesn't fit my generic response below: We do not specifically perform periodic review of plant maintenance activities. The response below will cover the remaining topics in Question 1.

The ISI group here at Seabrook issues Repair/Replacement travellers and subsequently completes NIS-2 forms. System Engineers and Planners are very good at getting us work orders up front to issue R/R travellers, and will ask if unsure. The work order has a check block for ISI review prior to closure. Scope changes to work orders also require R/R review for potential applicability. Design change packages have an ISI review signature so that we can screen for potential Code impacts.

Question 2: As the group supervisor, I look at condition reports and Nuclear Oversight group reports for equipment issues that may have Code implications.