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ROBERT C. MECREDDY  
Vice President  
Nuclear Operations

January 13, 2000

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Guy S. Vissing  
Project Directorate I  
Washington, D.C. 20555

Subject: Inservice Inspection Program ASME Section XI Required Examinations  
Third 10-Year Interval, Relief Request No. 44  
Fourth 10-Year Interval, Relief Request No. 16  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Vissing:

The purpose of this letter is to seek approval for the use of Relief Request Number 44 for the Third 10-Year Interval and Relief Request Number 16 for our new Fourth 10-Year Interval. Relief Request Number 44 is identical to Relief Request Number 16 but is being applied to different intervals. These Relief Request have been generated to address surface examination limitations (less than 90%) associated with the "A" and "B" Residual Heat Removal Heat Exchanger Integral Attachment Welds associated with the vessel component support.

This Relief is requested in accordance with 10 CFR 50.55a(g)(5)(iii) for two (2) component supports which contain three (3) Integral Attachment welds. The required examination coverage of  $\geq 90\%$  for the identified items are impractical and would require redesign of the support configuration to allow examination. Justification for performing the examinations with these limitations are included in the attachment to this letter.

Since part of this relief request is for our 3rd 10-year ISI program, which ends December 31, 1999, approval is requested by December 31, 2000 in accordance with 10CFR50.55a (g)(5)(iv).

Very truly yours,



Robert C. Mecreddy

Attachment  
JSM/mab:547

A047 %

xc: Mr. Guy S. Vissing (Mail Stop 8C2)  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector

## ATTACHMENT

Rochester Gas and Electric Corporation

Genoa Station

Docket No. 50/244

Third 10-Year Interval

Request for Relief No. 44 for the Third 10-Year Interval

Request for Relief No. 16 for the Fourth 10-Year Interval

Residual Heat Removal (RHR) Heat Exchanger Integral Attachment Weld Examination Limitations

### I. System/Component(s) for Which Relief is Requested:

This Relief Request pertains to two (2) Residual Heat Removal (RHR) Heat Exchanger component supports containing integral attachments, ASME Class 2, Category C-C, Item Number C3.10. Each component support on the heat exchangers are identical and contains three (3) channel iron integral attachments. ASME Section XI Code requires that for multiple vessels, only one welded attachment of only one of the multiple vessels shall be selected for surface examination. Inservice examination capability for the supports is limited as follows:

| <u>Summary #</u> | <u>Component</u> | <u>Weld ID</u> | <u>Exam Coverage</u> | <u>Limitations</u>     |
|------------------|------------------|----------------|----------------------|------------------------|
| 169130           | EAC02A           | 1A-1           | 65%                  | Inside of Channel Iron |
| 169140           | EAC02A           | 1A-2           | 65%                  | Inside of Channel Iron |
| 169150           | EAC02A           | 1A-3           | 65%                  | Inside of Channel Iron |
| 169330           | EAC02B           | 1B-1           | 67%                  | Inside of Channel Iron |
| 169340           | EAC02B           | 1B-2           | 64%                  | Inside of Channel Iron |
| 169350           | EAC02B           | 1B-3           | 65%                  | Inside of Channel Iron |

### II. ASME Section XI Code Requirement:

ASME Section XI Code requires essentially 100% of the weld length or area to be examined. ASME Section XI Code Case N-460 states that if the entire examination volume or area cannot be examined due to interference by another component or part geometry, a reduction in coverage is acceptable provided that the lack of coverage is less than 10%.

Request for Relief No. 44/16

III. Requirement from Which Relief is Requested:

Relief is requested from examining 100% of the weld length or areas for these identified items. Examining 100% of the weld length or areas would be impractical due to original design configuration.

IV. Basis for Relief:

Relief is requested pursuant to the provisions of 10 CFR 50.55a(g)(5)(iii), in that the required examination coverage for the identified items are impractical and would require redesign to allow examination.

The two identical Residual Heat Removal (RHR) Heat Exchangers were designed and constructed to ASME Section VIII, 1965 Edition. This Code did not contain requirements to ensure that items be accessible for future examinations. The ASME Class 2 Integral Attachments identified above were installed utilizing this construction code which did not provide for accessibility for future ISI NDE. The ISI ASME Section XI requirements are identified within Table IWC-2500-1, Category C-C, Item Number C3.10.

V. Alternate Examinations:

R.E. Ginna Nuclear Power Plant proposes that the surface examination coverage identified above be acceptable in fulfilling the required examination coverage.

VI. Justification for the Granting of Relief:

The Residual Heat Removal (RHR) Heat Exchangers were designed and constructed to ASME Section VIII, 1965 Edition construction code. This code did not contain requirements to ensure that items be made accessible for future NDE examinations. Due to the original design configuration, examination coverage can not be obtained to the extent required by the current ASME Code. The Integral Attachment welded configuration consist of a channel iron which is on an angle and welded all around to the curved Lower Head of the Heat Exchanger. The inside area of the channel iron to the Lower Head is an acute angle which prevents access for surface examination.

The Residual Heat Removal (RHR) Heat Exchangers are part of the ASME Section XI VT-2 Leakage Examination boundary. In addition to the ASME Section XI leakage examinations, operator walkdowns as specified by Plant Operating Procedures are also performed. The combination of operator walkdowns, period leakage examinations and inservice examination of all accessible areas of the weld lengths and areas (~65%) provide additional assurances for maintaining system boundary integrity.

VII. Implementation Schedule:

These required Code examinations have been performed, and code credit taken for the Third 10-year Interval inspection. The required examinations per this relief request shall be performed as scheduled for the Fourth 10-Year Interval.