



**North
Atlantic**

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The Northeast Utilities System

March 6, 2000

Docket No. 50-443

AR# 00002476

NYN-00014

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Seabrook Station

“Alternative Requests for the Second Ten-Year Interval Inservice Inspection Program”

North Atlantic Energy Service Corporation (North Atlantic) has enclosed herein two Alternative Requests. These alternative requests are submitted pursuant to the requirements of 10CFR50.55a(g)(4)(iv) and 10CFR50.55a(a)(3)(ii).

Alternative request 00-01 is provided in Enclosure 1. This alternative request outlines the North Atlantic proposal to utilize the 1995 Edition (including the 1996 Addenda) of Section XI of the American Society of Mechanical Engineer's (ASME) Boiler and Pressure Vessel Code in lieu of the 1989 Edition (no Addenda) of Section XI for Inservice Inspection (ISI) activities as required by 10 CFR 50.55a and Technical Specification 4.0.5.

Alternative request 00-02 is provided in Enclosure 2. This alternative requests outlines the North Atlantic proposal to delay the implementation of certain aspects of the Second Ten-Year Interval ISI program for 2 years as described in Nuclear Regulatory Commission (NRC) Information Notice 98-44, "Ten-Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping."

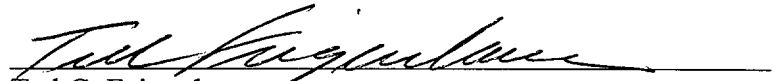
NRC commitments associated with this letter and the identified alternative requests are outlined in Enclosure 3.

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Should you have any questions regarding this letter, please contact Mr. James M. Peschel, Manager - Regulatory Programs, at (603) 773-7194.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.


Ted C. Feigenbaum
Executive Vice President
and Chief Nuclear Officer

cc: H. J. Miller, NRC Regional Administrator
R.M. Pulsifer, NRC Project Manager, Project Directorate 1-2
R. K. Lorson, NRC Senior Resident Inspector

ENCLOSURE 1 TO NYN-00014

Inservice Inspection Program
Alternative Request 00-01

North Atlantic is currently performing inservice inspection activities for the 1st Ten-Year Inservice Inspection (ISI) Interval in accordance with the requirements of the 1983 Edition (including Addenda through Summer 1983) of Section XI of the ASME Boiler and Pressure Vessel (B&PV) Code. 10 CFR 50.55a(g)(5)(i) specifies that the inservice inspection program for a boiling or pressurized water-cooled nuclear power facility must be revised by the licensee, as necessary, to meet the requirements of paragraph (g)(4). 10 CFR 50.55a(g)(4)(ii) requires Inservice Examination programs to be revised during successive 120-month (Ten-Year) intervals to comply with the latest edition and addenda of the Code incorporated by reference in paragraph (b) 12 months prior to the start of the interval.

It is intended that the 2nd Ten-Year (120-month) inservice inspection program interval for Seabrook Station will begin on August 18, 2000. As such, 10 CFR 50.55a(g)(4)(ii), requires that Seabrook Station comply with the 1989 Edition (no Addenda) of Section XI for the 2nd Ten-Year Interval ISI program, since it was the latest edition and addenda of the ASME Code for ISI activities referenced in paragraph (b) on August 18, 1999.

North Atlantic requests to utilize the 1995 Edition (including the 1996 Addenda) of Section XI in its entirety, subject to the limitations and modifications listed in paragraph (b)(2) of 10 CFR 50.55a in lieu of the 1989 Edition (no Addenda) of Section XI for ISI program activities. North Atlantic proposes to utilize the subject edition and addenda of Section XI primarily to reduce its administrative burden by performing ISI, Containment ISI and repair and replacement activities to the same edition and addenda of the ASME Code. The requirements of 10 CFR 50.55a(b)(2)(vi) were recently revised (64 FR 51370 effective November 22, 1999) for Containment ISI activities to permit licensees to utilize the 1995 Edition (including the 1996 Addenda) as modified and supplemented by the requirements in 10 CFR 50.55a(b)(2)(viii) and 10 CFR 50.55a(b)(2)(ix). Additionally, the rule change referenced in 64 FR 51370 also requires expedited implementation of mandatory Appendix VIII "Performance Demonstration for Ultrasonic Examination Systems" to the 1995 Edition (including the 1996 Addenda) of Section XI.

Since the 1995 Edition (including the 1996 Addenda) of Section XI was recognized as the latest edition and addenda incorporated by reference for ISI in paragraph (b)(2) as a result of the rule change referenced in 64 FR 51370 and will be required for general use by licensees whose revised ISI programs begin a successive interval on or after November 22, 2000, North Atlantic requests NRC approval for its use pursuant to the requirements of 10 CFR 50.55a(g)(4)(iv).

ENCLOSURE 2 TO NYN-00014

Inservice Inspection Program
Alternative Request 00-02

North Atlantic is in the process developing the Second Ten-Year Interval Inservice Inspection (ISI) Program for Seabrook Station. It is intended that the Second Ten-Year Inservice Inspection (ISI) Interval will commence on August 18, 2000.

In order to reduce unnecessary radiation exposure to plant personnel and to more efficiently focus ISI program inspection activities, North Atlantic is in the process of preparing a Risk Informed Inservice Inspection (RI-ISI) program for the Second Ten-Year Interval ISI program. The scope of the RI-ISI is limited to the inspection of ASME Class 1 piping (Examination Categories B-F and B-J). The RI-ISI program is being developed in accordance with EPRI Topical Report TR-112657 "Revised Risk-Informed Inservice Inspection Evaluation Procedure" as delineated in ASME Code Case N-578, "Risk-Informed Requirements for Class 1, 2 and 3 Piping, Method B, Section XI, Division 1." The development, review and subsequent approval of a RI-ISI program is a substantial effort that is expected to consume considerable North Atlantic and vendor resources. Due to the time constraints needed to develop, review and obtain NRC approval of a RI-ISI program, North Atlantic requests a 2-year delay for submitting a revised ISI Program for Class 1 piping subject to inspection required by Table IWB-2500-1, Examination Categories B-F and B-J of the 1995 Edition (including the 1996 Addenda) of Section XI.

The proposed alternative to delay submission of a revised ISI Program for Class 1 piping is requested pursuant to the requirements of 10 CFR 50.55a(a)(3)(i) on the basis that it provides an acceptable level of quality and safety and is consistent with the NRC staff position outlined in Information Notice 98-44, "Ten-Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping." The proposed 2-year delay for the submission of a revised ISI Program for Class 1 piping will also avoid the inspection of piping that is later found to be unnecessary from a risk perspective.

As a result of the 2-year delay, the non-destructive examinations (NDE) on the piping to be included in the RI-ISI program scope will be deferred until the RI-ISI program is approved. The remaining portions of the ISI program will be submitted as required by 10 CFR 50.55a(g)(4). During this 2-year delay period, the Code required pressure testing, repairs or replacements, and associated augmented programs will continue to be implemented as required. The examinations required for the Second Ten-Year Interval RI-ISI program will be completed by the end of the interval, including any ASME Code extensions.

ENCLOSURE 3 TO NYN-0001

North Atlantic Commitments Contained in NYN-00014

Description of Commitment

- AR#00002476-01** Upon or prior to the approval of Inservice Inspection Program Alternative Request 00-01, North Atlantic will submit the 2nd Ten-Year Interval Inservice Inspection Program to the NRC utilizing the 1995 Edition (including the 1996 Addenda) of Section XI in its entirety subject to the limitations and modifications listed in paragraph (b)(2) of 10 CFR 50.55a
- AR#00002476-02** Upon or prior to the approval of Inservice Inspection Program Alternative Request 00-02, North Atlantic will delay submission of a revised ISI program for Class 1 piping. North Atlantic will submit the remaining portions of the ISI program to the NRC as required by 10 CFR 50.55a(g)(4).