

March 29, 2000

Mr. John H. Mueller
Chief Nuclear Officer
Niagara Mohawk Power Corporation
Nine Mile Point Nuclear Station
Operations Building, Second Floor
P. O. Box 63
Lycoming, NY 13093

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT NO. 2 -- RELIEFS FOR THE
FIRST TEN-YEAR INSERVICE INSPECTION PROGRAM PLAN (TAC NO.
MA4873)

Dear Mr. Mueller:

By letter dated February 4, 1999, you requested a number of reliefs from Section XI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) and applicable addenda. With technical assistance from Idaho National Engineering and Environmental Laboratory (INEEL), we have reviewed the information concerning inservice inspection (ISI) program requests for relief requested for the first ten-year intervals. Your submittal contains revised (i.e., previously approved on October 24 or November 1, 1990) reliefs, as well as new reliefs. These are authorized as follows:

Request for Relief RR-IWB-1, Revision 1 -- Your revised alternative to the Code requirements provides an acceptable level of quality and safety. Therefore, the revised alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

Requests for RR-IWB-11, Revision 1; RR-IWB-12, Revision 2; RR-IWC-1, Revision 1, and RR-IWF-5 -- The Code requirements would result in a hardship without a compensating increase in the level of quality and safety. Therefore, the alternatives or revised alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

Requests for Relief RR-IWB-2, Revision 1; RR-IWB-3, Revision 1; RR-IWB-6, Revision 2; RR-IWB-7, Revision 1; RR-IWC-2, Revision 1; RR-IWC-3, Revision 1; RR-IWC-5, Revision 1 (Parts 1, 2, and 3); and RR-IWB-13 -- The Code requirements are impractical for the subject welds. Therefore, the reliefs or revised reliefs are granted pursuant to 10 CFR 50.55a(g)(6)(i).

Requests for Relief RR-IWD-1, RR-IWF-1, and RR-IWF-4 were previously authorized (November 1, 1990 and October 24, 1990). Since they are not changed by your February 4, 1999, submittal, they are not re-evaluated.

J. Mueller

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This completes all our actions on your February 4, 1999, submittal. Please contact the project manager, Mr. Peter Tam (301-415-1451, electronic mail at pst@nrc.gov) if you have any questions.

Sincerely,

/RA original signed by E. G. Adensam for/

Marsha Gamberoni, Acting Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-410

Enclosure: Safety Evaluation
w/attachments

cc w/encl: See next page

J. Mueller

- 2 -

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Marsha Gamberoni, Acting Chief, Section 1
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*Safety evaluation transmitted by memo of 2/28/00 essentially used as-is.

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Unit No. 2

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEFS FOR FIRST TEN-YEAR INTERVAL INSERVICE INSPECTION PLAN

NINE MILE POINT NUCLEAR STATION, UNIT NO. 2

NIAGARA MOHAWK POWER CORPORATION

DOCKET NUMBER 50-410

1.0 INTRODUCTION

Inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components is performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (ASME Code) and applicable addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first ten-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The Code of record for the Nine Mile Point, Unit 2, first ten-year ISI interval is the 1983 Edition through Summer 1983 Addenda of the ASME Code.

2.0 EVALUATION

The NRC staff, with technical assistance from Idaho National Engineering and Environmental Laboratory (INEEL), has reviewed the information concerning ISI program requests for relief submitted for the first ten-year intervals for Nine Mile Point, Unit 2, in a Niagara Mohawk Power Corporation (the licensee) letter dated February 4, 1999.

The staff adopts the evaluations and recommendations for granting relief or authorizing alternatives contained in the Technical Letter Report (TLR, attached to this safety evaluation)

prepared by INEEL. Table 1 of this safety evaluation lists each relief request and the status of approval.

For Nine Mile Point, Unit 2, relief is granted from, or alternatives are authorized to, the inspection requirements which have been determined to be impractical to perform, where an alternative provides an acceptable level of quality and safety, or where compliance would result in a hardship or unusual difficulty without a compensating increase in quality or safety.

The ISI program relief requests are granted or authorized and closeout the first ten-year ISI interval.

3.0 CONCLUSION

The Nine Mile Point, Unit 2 ISI program requests for relief from the Code requirements have been reviewed by the staff with the assistance of its contractor, INEEL. The TLR provides INEEL's evaluation of these relief requests. The staff has reviewed the TLR and concurs with the evaluations and recommendations for granting relief or authorizing alternatives. A summary of the relief request determinations is presented in Table 1.

The staff concludes that the relief requests as evaluated by this safety evaluation will provide reasonable assurance of structural integrity of the subject components in the licensee's requests for relief. The staff has determined that granting relief pursuant to 10 CFR 50.55a (g)(6)(i) and authorizing alternatives pursuant to 10 CFR 50.55a(a)(3)(i) or (a)(3)(ii) is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest.

Principal Contributor: Thomas K. McLellan, with contractual assistance from INEEL

Date: March 29, 2000

TABLE 1
SUMMARY OF RELIEF REQUESTS

Relief Request Number	System or Component	TLR Section	Exam Category	Item No.	Volume or Area to be Examined	Required Method	Licensee Proposed Alternative	Relief Request Status
RR-IWB-1 Revision 1	Reactor Pressure Vessel	2.A	B-O	B14.10	Control Rod Drive Mechanisms	Volumetric	Substitute partial exams of increased population	Authorized (a)(3)(i)
RR-IWB-2 Revision 1	Reactor Pressure Vessel	2.B	B-D	B3.90	Reactor Pressure Vessel Nozzle-to-Shell Welds	Volumetric	Perform volumetric examinations to extent practical. Perform VT-1 on portions that cannot be volumetrically examined	Granted (g)(6)(i)
RR-IWB-3 Revision 1	Reactor Pressure Vessel	2.C	B-A	B1.30	RPV Shell-to-Flange Weld	Volumetric	Perform volumetric examinations from the shell side to the maximum extent possible and supplement this with examinations from the flange face	Granted (g)(6)(i)
RR-IWB-6 Revision 2	Class 1 Piping	2.D	B-J	B9.11	Circumferential Welds NPS 4 or Larger	Surface and Volumetric	Perform surface examination to maximum extent possible	Granted (g)(6)(i)
RR-IWB-7 Revision 1	Reactor Pressure Vessel	2.E	B-A	B1.21 B1.22	Circumferential and Meridional Head Welds	Volumetric	Perform volumetric examinations to the maximum extent possible based on design limitations	Granted (g)(6)(i)
RR-IWB-11 Revision 1	Class 1 Pumps	2.F	B-L-2	B12.20	Pump Casing Internal Surfaces	Visual Examination (VT-3)	Perform visual examinations when pumps are disassembled	Authorized (a)(3)(ii)

TABLE 1
SUMMARY OF RELIEF REQUESTS

Relief Request Number	System or Component	TLR Section	Exam Category	Item No.	Volume or Area to be Examined	Required Method	Licensee Proposed Alternative	Relief Request Status
RR-IWB-12 Revision 2	Class 1 Valves	2.G	B-M-2	B12. 50	Valve Body Internal Surfaces	Visual Examination (VT-3)	Perform visual examinations when valves are disassembled	Authorized (a)(3)(ii)
RR-IWC-1 Revision 1	Class Pumps	2.H	C-C C-G	C3.3 0 C6.1 0	Pump Integral Welded Attachments Pump Casing Welds	Surface	Perform surface examinations when pumps are disassembled	Authorized (a)(3)(ii)
RR-IWC-2 Revision 1	Class 2 Welds	2.I	C-F-1	C5.1 1	Piping Circumferential Welds	Surface and Volumetric	Perform Code Required Examinations on the 17 Accessible Welds	Granted (g)(6)(i)
RR-IWC-3 Revision 1	Class 2 Piping	2.J	C-C	C3.2 0	Integral Welded Attachments	Surface	None	Granted (g)(6)(i)
RR-IWC-5 Revision 1 (Part 1)	Class 2 Vessels	2.K	C-A C-B	C1.1 0 C2.2 1	Vessel Welds Nozzle-to-Shell Welds	Volumetric Surface and Volumetric	Perform volumetric and/or surface examination to maximum extent possible.	Granted (g)(6)(i)
RR-IWC-5 Revision 1 (Part 2)	Class 2 Piping	2.L	C-C C-F-1	C3.2 0 C5.1 1	Integrally Welded Attachments Piping Welds	Surface and/or Volumetric	Perform volumetric and/or surface examinations to maximum extent possible	Granted (g)(6)(i)
RR-IWC-5 Revision 1 (Part 3)	Class 2 Valves	2.M	C-G	C6.2 0	Valve Body Welds	Surface	Perform surface examinations to maximum extent possible	Granted (g)(6)(i)
RR-IWD-1	Class 3 Piping	2.N			Integral Attachments and Supports	Visual Examination (VT-3)		Authorized in SER Dated November 1, 1990

TABLE 1
 SUMMARY OF RELIEF REQUESTS

Relief Request Number	System or Component	TLR Section	Exam Category	Item No.	Volume or Area to be Examined	Required Method	Licensee Proposed Alternative	Relief Request Status
RR-IWF-1	Supports	2.O	F-C	F3.50	Supports	Visual Examination (VT-3, and VT-4)		Authorized in SER Dated November 1, 1990
RR-IWF-4	Snubbers	2.P						Authorized in SER Dated October 24, 1990
RR-IWB-13	Reactor Pressure Vessel	2.Q	B-G-1	B6.40	Thread in RPV Flange	Volumetric	Perform volumetric examinations to maximum extent possible	Granted (g)(6)(i)
RR-IWF-5	Class 1, 2, and 3 Supports	2.R	IWF IWD		Supports	Visual Examination (VT-3)	Perform Visual Examinations (VT-3) without removal of Insulation	Authorized (a)(3)(ii)

TECHNICAL LETTER REPORT
ON
THE FIRST 10-YEAR INTERVAL INSERVICE INSPECTION REQUESTS FOR RELIEF
FOR
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT, UNIT 2
DOCKET NUMBER: 50-410

1. INTRODUCTION

By letter dated February 4, 1999, the licensee, Niagara Mohawk Power Corporation, submitted requests for relief from the requirements of the ASME Code, Section XI, for Nine Mile Point, Unit 2. These relief requests are for the close out of the first 10-year inservice inspection (ISI) interval. The Idaho National Engineering and Environmental Laboratory (INEEL) staff's evaluation of the subject requests for relief is in the following section.

2. EVALUATION

The information provided by Niagara Mohawk Power Corporation in support of the requests for relief from Code requirements has been evaluated and the bases for disposition are documented below. The Code of record for the Nine Mile Point, Unit 2, first 10-year ISI interval, which began March 11, 1988, is the 1983 Edition through Summer 1983 Addenda of Section XI of the ASME Boiler and Pressure Vessel Code.

A. Request for Relief RR-IWB, Revision 1, Examination Category B-O, Item Number B14.10, Welds in CRD Housing

Code Requirement: Examination Category B-O, Item B14.10 requires volumetric or surface examination each inspection interval on 10% of peripheral CRD housing welds, as defined by Figure IWB-2500-18.

Licensee's Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(i), the licensee proposed to substitute partial examinations of the 10% sample of peripheral welds plus six additional welds in lieu of the Code requirement.

The licensee stated:

“Partial examinations of 10% of the welds plus six additional welds, such that the aggregate total is greater than or equal to eight full examinations (total 720 total percentage points.)”

Licensee's Basis for Proposed Alternative (as stated):

“Limited accessibility for all peripheral CRD housing welds due to inherent obstructions caused by surrounding cables, tubing, and foundations which are not practical to remove or replace.

“There are 40 peripheral CRD housings. Each housing has two welds. Therefore, eight welds are required to be examined. Assuming a Code (Case) minimum coverage allowable of 90%, eight (8) full examinations equals a minimum requirement of 720 total percentage points.

“Fourteen (14) welds were actually selected for examination. All were examined by the end of Refueling Outage (RFO)-4. Examination coverages ranged from 27% to 100%. The total of examined percentage points summed to 953, thus exceeding the 720 required.

“Although the use of an inspection mirror achieved 100% coverage on three of the welds (thus reducing the original population for which relief is sought from 8 to 5) this request is still required. It has been modified accordingly and resubmitted for First Interval Closure.

Evaluation: An earlier version of this request for relief was authorized in an NRC SER dated November 1, 1990. The current revision of this request for relief documents the examinations performed. Based on the coverages obtained, the number of welds requiring relief was reduced from eight in the original revision to five in the current revision. The original evaluation concluded that the Code-required examinations were impractical due to obstructions by adjacent CRD housings, cables, tubing and foundations. Removing three welds from the request for relief does not change the original evaluation’s technical justification of the proposed alternative. Therefore, based upon the original SER, it is recommended that the proposed alternative remain authorized for the revised version of this request for relief in accordance with 10 CFR 50.55a(a)(3)(i).

B. Request for Relief RR-IWB-2 Revision 1, Examination Category B-D, Item B3.90, Reactor Pressure Vessel Nozzle-to-Shell Welds

Code Requirement: Examination Category B-D, Item B3.90 requires a 100% volumetric examination of reactor pressure vessel (RPV) nozzle-to-vessel welds as defined by Figure IWB-2500-7.

Licensee’s Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from performing volumetric examinations to the extent required by the Code for the inaccessible portions of the RPV nozzle-to-vessel welds identified in the following table.

Comp. ID	Component Description	ASME Category	Item Number	Aggregate Coverage
2RPV-KA01	Nozzle-to-Shell Weld	B-D	B3.90	58%
2RPV-KA02	Nozzle-to-Shell Weld	B-D	B3.90	58%
2RPV-KA03	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA04	Nozzle-to-Shell Weld	B-D	B3.90	65%

Comp. ID	Component Description	ASME Category	Item Number	Aggregate Coverage
2RPV-KA05	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA06	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA07	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA08	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA09	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA10	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA11	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA12	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA13	Nozzle-to-Shell Weld	B-D	B3.90	63%
2RPV-KA14	Nozzle-to-Shell Weld	B-D	B3.90	63%
2RPV-KA15	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA16	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA17	Nozzle-to-Shell Weld	B-D	B3.90	56%
2RPV-KA18	Nozzle-to-Shell Weld	B-D	B3.90	56%
2RPV-KA19	Nozzle-to-Shell Weld	B-D	B3.90	58%
2RPV-KA20	Nozzle-to-Shell Weld	B-D	B3.90	63%
2RPV-KA21	Nozzle-to-Shell Weld	B-D	B3.90	58%
2RPV-KA22	Nozzle-to-Shell Weld	B-D	B3.90	63%
2RPV-KA23	Nozzle-to-Shell Weld	B-D	B3.90	56%
2RPV-KA24	Nozzle-to-Shell Weld	B-D	B3.90	61%
2RPV-KA25	Nozzle-to-Shell Weld	B-D	B3.90	69%
2RPV-KA26	Nozzle-to-Shell Weld	B-D	B3.90	65%
2RPV-KA27	Nozzle-to-Shell Weld	B-D	B3.90	63%
2RPV-KA28	Nozzle-to-Shell Weld	B-D	B3.90	63%
2RPV-KA29	Nozzle-to-Shell Weld	B-D	B3.90	64%
2RPV-KA30	Nozzle-to-Shell Weld	B-D	B3.90	64%
2RPV-KA31	Nozzle-to-Shell Weld	B-D	B3.90	64%

Comp. ID	Component Description	ASME Category	Item Number	Aggregate Coverage
2RPV-KA32	Nozzle-to-Shell Weld	B-D	B3.90	67%
2RPV-KA33	Nozzle-to-Shell Weld	B-D	B3.90	63%

Licensee's Basis for Requesting Relief (as stated):

"The automated examinations of these RPV nozzle-to-shell welds is limited to varying extents due to nozzle-to-shell blend, vessel scanner tracks, other nozzles, limited access from nozzle side of welds and mechanical limitations.

Licensee's Proposed Alternative Examination (as stated):

"Perform volumetric examinations to the maximum extent practical, utilizing the latest UT techniques. VT-1 will be performed on portions that cannot be volumetrically examined."

Evaluation: An earlier version of this request for relief was granted in an NRC SER dated November 1, 1990. The current revision of this request for relief documents the examinations performed. Based on the coverages obtained, the number of nozzle-to-vessel welds requiring relief was increased from 23 in the original version to 33 in the current revision. The limitations associated with the additional welds are similar to the limitations associated with the original 23 welds. The original evaluation concluded that the Code-required examinations were impractical due to the design of the RPV and nozzles. The increase of ten nozzle-to-vessel welds from the original request for relief does not change the original evaluation's technical justification for the granting of relief. Therefore, based upon the original SER, it is recommended that relief remain granted for the revised version of this request for relief pursuant to 10 CFR 50.55a(g)(6)(i).

C. Request for Relief RR-IWB-3 Revision 1, Category B-A, Item B1.30, Reactor Vessel Shell-to-Flange Weld

Code Requirement: Examination Category B-A, Item B1.30 requires a 100% volumetric examination of the reactor pressure vessel (RPV) shell-to-flange weld as defined by Figure IWB-2500-4.

Licensee's Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from performing volumetric examinations to the extent required by the Code for the inaccessible portions of Category B-A Weld 2RPV-AE.

Licensee's Basis for Requesting Relief (as stated):

"The configuration of the subject weld joint does not allow access from both sides of the weld due to ID taper from the flange forging to the thinner upper shell course.

"Code coverage was achieved for the RPV welds for which relief was sought in the original submittal; therefore, they have been deleted. Examination of the subject weld was performed to the maximum extent possible from both the RPV shell course and from the flange face as recommended. Because of unparallel surfaces above the weld,

it is impossible to achieve further coverage without redesign of the flange. This Relief Request is still required. It has been modified accordingly and is resubmitted for First Interval closure.

Licensee's Proposed Alternative Examination (as stated):

"Perform volumetric examinations from the shell side to the maximum extent possible and supplement this with examinations from the flange face as recommended in ASME Section 5, Article 4, Para. T-441.3.2.2."

Evaluation: The Code requires that the subject reactor pressure vessel shell-to-flange weld be 100% volumetrically examined during the inspection interval. Due to the geometric configuration of this weld (extreme ID taper of flange), the examination was limited to 52% of the required volume from the shell side of the weld. However, the licensee was able to obtain 100% longitudinal beam examination from the flange face. Based on the information provided in this request for relief, it is concluded that examination of the subject weld to the extent required by the Code is impractical. For complete examination, redesign and modification of the reactor vessel shell-to-flange weld would be necessary. Imposition of this requirement would cause a considerable burden on the licensee.

Based upon the volumetric examination of the accessible portion of the subject weld, and the volumetric examinations on other RPV welds, it is concluded that significant patterns of degradation, if present, would have been detected. As a result, reasonable assurance of continued structural integrity has been provided. Therefore, pursuant to 10 CFR 50.55a(g)(6)(i), it is recommended that relief be granted.

D. Request for Relief RR-IWB-6 Revision 2, Examination Category B-J, Item No. B9.11 Circumferential Welds NPS 4 or Larger

Code Requirement: Examination Category B-J, Item B9.11 requires 100% surface and volumetric examination of circumferential welds in pressure-retaining piping NPS 4 or larger during each inspection interval, as defined by Figure IWB-2500-8.

Licensee's Code Relief Request: Pursuant to 10 CFR 50.55a(g)(5)(iii), the licensee has requested relief from performing the surface examination to the extent required by the Code for Weld 2RCS-64-00-SW35.

Licensee's Basis for Requesting Relief (as stated):

"Access for the surface exam is limited by a pipe rupture restraint.

"The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. Revision 0 of this request contained (12) items, and was rejected by NRC. The first revision deleted four (4) weldments from the request, and was required to acquire Commission approval. Utilization of the latest UT techniques, combined with the allowances contained in Code Case N-460 have further reduced the number of weldments for which relief is sought to one (1): 2RCS-64-00-SW35, where 100% of the UT exam was completed but only 66% of the required surface exam was completed during RFO-1. The entire Code Required Volume has been examined volumetrically by UT and was acceptable, thus ensuring the integrity of the more critical inner third of the

weld volume from where flaws detrimental to the weld integrity would be expected to originate. NMP2 anticipates no changes in the overall level of plant quality and safety based on performing the subject exam to the maximum extent possible.

“Without redesign of the affected rupture restraint, additional coverage is not possible.”

Licensee’s Proposed Alternative Examination (as stated):

“Surface examination is performed to the maximum extent possible.”

Evaluation: The Code requires 100% surface and volumetric examination of the subject Class 1 piping weld. Interference from a permanent pipe rupture restraint limits access and precludes complete surface examination of the subject weld. To meet the Code examination requirements, design modifications of the restraint would be necessary. Therefore, the Code surface examination requirement is impractical. Imposition of this requirement would create a significant burden on the licensee.

The licensee was able to perform a surface examination on a significant portion (66%) of the subject weld. All of the Code-required volume was examined. In addition, this weld is part of a larger population of Examination Category B-J welds that has been examined. Based on the surface and volumetric examinations performed, the INEEL staff concludes that any significant patterns of degradation, if present, would have been detected. Therefore, reasonable assurance of structural integrity has been provided.

Based on the impracticality of meeting the Code’s surface examination requirements for the subject weld, and the reasonable assurance of structural integrity provided by the examinations completed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

E. Request for Relief RR-IWB-7 Revision 1, Examination Category B-A, Items B1.21, and B1.22, Pressure-Retaining Welds in Reactor Vessel

Code Requirement: Examination Category B-A, Items B1.21 and B1.22 require 100% volumetric examination of the accessible portion of all circumferential and meridional head welds, as defined by Figure IWB-2500-3.

Licensee’s Code Relief Request: In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required 100% volumetric examination of the welds listed below.

Comp. ID	Component Description	ASME Category	Item Number	Aggregate Coverage	Limitation
2RPV-DG	Circumferential bottom head dollar plate-to-bottom head dollar plate	B-A	B1.21	19%	CRD Penetrations, Vessel Support Skirt

2RPV-DR	Circumferential bottom head dollar plate-to-bottom head dollar plate	B-A	B1.21	21%	CRD Penetrations, Vessel Support Skirt
2RPV-DB	Meridional bottom head radial plate-to-bottom head radial plate	B-A	B1.22	82%	CRD Penetrations, Vessel Support Skirt
2RPV-DC	Meridional bottom head radial plate-to-bottom head radial plate	B-A	B1.22	82%	CRD Penetrations, Vessel Support Skirt

Licensee's Basis for Requesting Relief (as stated):

"Accessibility for the manual volumetric examinations on the bottom head welds is limited due to interference with the CRD penetrations and the vessel support skirt. Only approximately 12" to 24" on each end of welds 2RPV-DG & 2RPV-DR can be examined due to interference with the CRD penetration housings. Approximately one foot cannot be examined on each of the other bottom head welds due to interference with the RPV support skirt.

Licensee's Proposed Alternative Examination (as stated):

"Perform volumetric examinations to the maximum extent possible based on design limitations."

Evaluation: An earlier version of this request for relief was granted in an NRC SER dated November 1, 1990. The current revision of this request for relief documents the examinations performed. Based on the coverages obtained, the number of welds requiring relief was reduced from nine in the original version to four in the current revision. The original evaluation concluded that the Code-required examinations were impractical due to design of the bottom head assembly. Removing five welds from the original request does not change the original evaluation's technical justification for the granting of relief. Therefore, based upon the original SER, it is recommended that the current revision of this request for relief remain granted pursuant to 10 CFR 50.55a(g)(6)(i).

F. Request for Relief RR-IWB-11 Revision 1, Examination Category B-L-2, Item B12.20, Pump Casing Internal Surfaces

Code Requirement: Examination Category B-L-2, Item B12.20, requires a VT-3 visual examination of the internal surfaces of at least one pump in each group of pumps performing similar functions in the system. This examination may be performed on the same pump selected for volumetric examination of welds. The examination may be performed at or near the end of the 10-year interval.

Licensee's Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(ii), the licensee proposed to perform VT-3 examination on Reactor Coolant Recirculation Pumps 2RCS*P1A and 2RCS*P1B when they are disassembled.

The licensee stated:

"..NMPC will perform a VT-3 examination of the internal casing pressure boundary surfaces when a recirculation pump is disassembled for maintenance."

Licensee's Basis for Proposed Alternative (as stated):

"NMP2 anticipates approximately 1000 man-hours and 50 man-rem exposure would be required to disassemble, inspect, and reassemble one pump. Performing this visual examination under adverse conditions such as high dose rate (30-40 R/hr) and poor as-cast surface condition, realistically, provides little additional information as to pump casing integrity. The pump casing material, cast stainless steel (ASTM A351-CF-8M) is widely used in the nuclear industry and has performed extremely well. The presence of some delta ferrite (typically 5% or more) imparts substantially increased resistance to intergranular stress corrosion cracking. The delta ferrite also results in improved pitting corrosion resistance in chloride containing environments. Therefore, the hardships associated with pump disassembly far exceed any beneficial safety improvements that might be achieved by such an examination, as the structural integrity afforded by the pump casing material utilized will not significantly degrade over the lifetime of the pump. NMPC feels that adequate safety margins are inherent in the basic pump design and that the health and safety of the public will not be adversely affected by performing the visual examination of the pump internal pressure boundary surfaces only when the pumps are required to be disassembled for maintenance. Furthermore, both pumps will be VT-2 examined every refueling outage during the Class 1 System Leakage Tests.

"The population has remained the same through the first interval. By letter (NMP1L0722) dated December 11, 1992, NMPC communicated to NRC its knowledge of, and intent to use, relaxed criteria that had been approved for use by NRC. In that letter, NMPC noted that;

"effective September 8, 1992, NRC amended 10CFR50 to incorporate by reference the 1989 Edition of ASME Section XI,

"the 1989 Edition requires the VT-3 only when a pump is disassembled for maintenance, repair or volumetric examination,

"the 1989 Edition requires the VT-3 only once during an inspection *interval*,

"the ASME relaxed this Code requirement because they had determined that disassembly of a valve (pump) solely for the purpose of visual inspection did not provide a significant return in terms of safety and therefore was not warranted,

"the intrusive nature of internal examinations can impose unnecessary radiation exposure.

"By letter dated January 27, 1993, the Commission acknowledged the correctness of NMPC's interpretation. Although the impetus for this communication was related to NMP1, the stance is also applicable to NMP2, and is applied herein. Therefore, only the interior surface of one recirculation pump requires VT-3 examination, if and only if the pump is disassembled for maintenance, repair, or volumetric examination.

"This Relief Request was utilized during the first interval. It has been revised and is resubmitted for First Interval closure."

Evaluation: Examination Category B-L-2, Item B12.20, requires a VT-3 visual examination of the internal surfaces of at least one pump in each group of pumps performing similar functions in the system. This examination may be performed on the same pump selected for volumetric examination of welds. The examination may be performed at or near the end of the 10-year interval.

The licensee submitted Request for Relief RR-IWB-11 earlier in the first 10-year interval and it was evaluated in an SER Dated November 1, 1990. At that time, it was determined that the disassembly of the pumps solely for the purpose of inspection was unjustified. The possibility of additional wear or damage to the internal surfaces of the pumps, and excessive levels of radiation exposure to plant personnel that could result if the licensee was required to meet the Code requirements would result in hardship or unusual difficulties without a compensating increase in the level of quality and safety. Therefore, the previous evaluation concluded that (a) the licensee's proposal to perform the visual examination (VT-3) on the internal surfaces of the recirculation pumps whenever they were made accessible due to pump disassembly for maintenance or other purposes was acceptable, and (b) relief should be authorized at the end of the interval if one of the subject pumps, for which a visual examination is required, had not been disassembled.

The licensee's current revision of Request for Relief RR-IWB-11 identifies no pumps receiving the Code-required internal visual examination during the first ten-year interval. However, later editions of the Code, approved in the Code of Federal Regulations (1989 Edition), requires examination only when the pump is disassembled. Therefore, based on the evaluation performed earlier in the interval on Request for Relief RR-IWB-11, the relaxed requirements found in later editions of the Code, and the hardship associated with the disassembly of the pumps, it is recommended that the licensee's proposed alternative remain authorized as previously determined, pursuant to 10 CFR 50.55a(a)(3)(ii).

G. Request for Relief RR-IWB-12, Revision 2, Examination Category B-M-2, Item B12.50, Internal Surfaces of Valve Bodies

Code Requirement: Examination Category B-M-2, Item B12.50 requires a VT-3 visual examination of the internal surfaces of valve bodies. The examinations are limited to one valve within each group of valves that are of the same constructional design (such as globe, gate, or check valve) and manufacturing method, and that perform similar functions in the system. The examination may be performed on the same valve selected for volumetric examination. The examination may be performed at or near the end of the interval.

Licensee's Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(ii), the licensee proposed to perform VT-3 examinations of valve bodies when they are disassembled. The licensee stated:

“When a valve within a particular group is disassembled for maintenance purposes, the internal pressure boundary surface of the valve body will be examined to meet the ASME Section XI requirements for that group of valves. The valve maintenance procedure will address the need for this examination.”

Licensee's Basis for Proposed Alternative (as stated):

"The NMP2 Class 1 systems contain 78 valves. They have been divided into 35 groups based on similar functions and the same design and manufacturing method. If examinations were performed in accordance with the Code, then 35 valves would be required to be disassembled for inspection each *interval*. The requirement to disassemble primary system valves for the sole purpose of performing a visual examination of the internal pressure boundary surfaces has only a very small potential of increasing plant safety margins and a disproportionate impact on expenditures of plant manpower and radiation exposure. Furthermore, performing these visual examinations on poor as-cast surfaces provides little additional information as to the valve body integrity. For approximately 20% of these valves, the reactor vessel core must be completely unloaded and the vessel drained to permit disassembly for examination. The performance of both carbon and stainless cast and forged valve bodies used to construct these valves has been excellent in all BWR applications. Based on this experience and both industry and regulatory acceptance of these alloys, continued excellent service performance is anticipated. A more practical approach, that would essentially provide an equivalent sampling program and significantly reduce radiation exposure to plant personnel, is to inspect the internal pressure boundary of only those valves that require disassembly for maintenance purposes. This would still provide a reasonable sampling of primary system valves and give adequate assurance that the integrity of these components is being maintained.

"The population has remained the same through the first interval. By letter (NMP1L0722) dated December 11, 1992, NMPC communicated to NRC its knowledge of, and intent to use, relaxed criteria that had been approved for use by NRC. In that letter, NMPC noted that:

"effective September 8, 1992, NRC amended 10CFR50 to incorporate by reference the 1989 Edition of ASME Section XI,

"the 1989 Edition requires the VT-3 only when a valve is disassembled for maintenance, repair or volumetric examination, and that the VT-3 is required only once during an inspection *interval*,

"the ASME relaxed this Code requirement because they had determined that disassembly of a valve solely for the purpose of visual inspection did not provide a significant return in terms of safety and therefore was not warranted,

"the intrusive nature of internal examinations can impose unnecessary radiation exposure.

"By letter dated January 27, 1993, the Commission acknowledged the correctness of NMPC's interpretation. Although the impetus for this communication was related to NMP1, the stance is also applicable to NMP2, and is applied herein. Therefore, only the interior surface of one valve in a group requires VT-3 examination, if and only if the valve is disassembled for maintenance, repair, or volumetric examination; and even then, only to the extent deemed practical by the Owner, and never more than once in any Code Inspection Interval.

“This Relief Request was utilized during the first interval. It has been revised and is resubmitted for First Interval closure.

Evaluation: Examination Category B-M-2, Item B12.50 requires a VT-3 visual examination of the internal surfaces of valve bodies. The examinations are limited to one valve within each group of valves that are of the same constructional design (such as globe, gate, or check valve) and manufacturing method, and that perform similar functions in the system.

The licensee submitted Request for Relief RR-IWB-12 earlier in the first 10-year interval. This request was evaluated in an SER Dated November 1, 1990. At that time, it was determined that the disassembly of the valves solely for the purpose of inspection was unjustified. The possibility of additional wear or damage to the internal surfaces of the valves and excessive levels of radiation exposure to plant personnel that could result if the licensee was required to meet the Code requirements would result in hardship or unusual difficulties without a compensating increase in the level of quality and safety. Therefore, the previous evaluation concluded that (a) the licensee’s proposal to perform the visual examination (VT-3) on the internal surfaces of the valves whenever they were made accessible due to pump disassembly for maintenance or other purposes was acceptable, and (b) relief should be authorized at the end of the interval if one of the subject valves, for which a visual examination is required, had not been disassembled.

The licensee’s current revision of Request for Relief RR-IWB-12 identifies no valves receiving the Code-required internal visual examination during the first ten-year interval. However, later editions of the Code approved in the Code of Federal Regulations (1989 Edition) require examination only when the valve is disassembled. Therefore, based on the evaluation performed earlier in the interval on Request for Relief RR-IWB-12, the relaxed requirements found in later editions of the Code, and hardship associated with the disassembly of the valves for the sole purpose of visual examination, it is recommended that the licensee’s proposed alternative remain authorized as previously determined, pursuant to 10 CFR 50.55a(a)(3)(ii).

H. Request for Relief RR-IWC-1 Revision 1, Examination Category C-C, Item C3.30, Integral Welded Attachments on Pumps (RHR, HPCS, and LPCS Pumps), and Examination Category C-G, Item C6.10, Pressure-Retaining Pump Casing Welds

Code Requirement: Examination Category C-C, Item C3.30 requires 100% surface examination of integrally welded attachments of Class 2 pumps as defined by Figure IWC-2500-5. Examination Category C-G, Item C6.10, requires 100% surface examination of Class 2 pump casing welds as defined by Figure IWC-2500-8. In the case of multiple pumps of similar design, size, function, and service in a system, the examination of only one pump among each group of multiple pumps is required. The examination may be performed from either the inside or outside surface of the component. The pumps initially selected for examination shall be reexamined over the service lifetime of the component.

Licensee’s Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(ii), the licensee proposed to perform surface examinations on welds of the following pumps that become accessible when disassembled for routine maintenance.

Pump	Examination Category C-G, Item C6.10, Pump Casing Welds	Examination Category C-C, C3.30, Integral Attachments
2CSH*P1	PW207, 208, 209, 212, 217, 218, 219	PW220, 221, 222, 223
2CSL*P1	PW311, 312, 315, 316	PW319
2RHS*P1A	PW111A, 112A, 113A, 116A, 118A	PW121A
2RHS*P1B	PW111A, 112A, 113A, 116A, 118A	PW121B
2RHS*P1C	PW111A, 112A, 113A, 116A, 118A	PW121C
2ICS*P1	NA	PW400, 401, 402, 403

The licensee stated:

“Perform surface examination on welds of pumps that become accessible when disassembled for routine maintenance. ”

Licensee’s Basis for Proposed Alternative (as stated):

“The pumps are installed in a concrete pit, thereby making the exterior of the casing welds and entire integral attachment welds inaccessible for surface examination. Examination of the casing welds would require either disassembly or removal from the pit. Examination of the integral attachment welds would require lifting the pump from the pit. The hardships associated with pump disassembly and lifting from the pit would far exceed any beneficial safety improvement that might be achieved by such an examination. For the integral attachment on pump 2ICS*P1, approximately 17% of each of the four welds is inaccessible. The pump design utilizes U shaped attachments that limit access to the entire weld surface.

“Technical Justification and Data to Support the Determination: The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. The population has increased to 38 through the first interval, as none of the five (5) pumps had been removed or disassembled for maintenance during the *interval*. This request has been revised to include 2CSH*P1, PW221 2CSL*P1, PW316 which were also found to be inaccessible, for the same reason, and 2ICS*P1 as explained above, and is hereby resubmitted for First Interval closure.”

Evaluation: Examination Category C-C, Item C3.30 requires 100% surface examination of integrally welded attachments of Class 2 pumps as defined by Figure IWC-2500-5. Examination Category C-G, Item C6.10, requires 100% surface examination of Class 2 pump casing welds as defined by Figure IWC-2500-8. In the case of multiple pumps of similar design, size, function, and service in a system, the examination of only one pump among each group of pumps is required. The examination may be performed from either the inside or outside surface of the component. The pumps initially selected for examination shall be reexamined over the service lifetime of the component.

An earlier version of this proposed alternative was authorized in an NRC SER dated November 1, 1990. The original evaluation concluded that the disassembly of the pumps

for the sole purpose of inspection is a major effort and could result in damage to the pumps and excessive radiation exposure to plant personnel. The current revision of this request documents the addition of six welds (four integral attachment welds and two pump casing welds) to those previously approved for relief. The addition of the two pump casing welds and four integral attachment welds does not change the bases of the original evaluation's technical justification. In addition, the licensee was capable of obtaining 83% of the required surface examination coverage of integral attachments PW400, PW401, PW402, and PW403 during the interval. Therefore, based upon the original SER evaluation, and the surface examinations achieved for integral attachments PW400, PW401, PW402, and PW403, it is recommended that the proposed alternative remain authorized as previously determined, pursuant to 10 CFR 50.55a(a)(3)(ii).

I. Request for Relief RR-IWC-2 Revision 1, Examination Category C-F-1, Item C5.11, Class 2 Pressure-Retaining Piping Welds in the Suppression Pool Area

Code Requirement: Examination Category C-F-1, Item C5.11 requires 100% volumetric and surface examination of 7.5%, but not less than 28 welds, of all non-exempt Category C-F-1 welds.

Licensee's Request for Relief: In accordance with 10 CFR 50.55a(g)(6)(i), the licensee requested relief from the Code-required volumetric and surface examinations on the following inaccessible welds:

2CSH-25-05-FW012, 013, 014 and 015

2CSL-26-01-FW026, 027, 028 and 035

2RHS-66-13-FW-23, 024, 025 and 029

2RHS-66-22-FW021, 022, 023 and 029

2RHS-66-23-FW018, 019, 020 and 022

Licensee's Basis for Requesting Relief (as stated):

"Twenty (20) of the 37 welds are inaccessible for both surface and volumetric examination (by design, as they are submerged in the suppression pool). Greater access would require these systems to be redesigned.

"Technical Justification and Data to Support the Determination: The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. There has been no change in the NMP2 design through the interval. As such, the granted relief was used on all 20 weldments. This request for relief is hereby resubmitted for First Interval closure.

Licensee's Proposed Alternative Examination (as stated):

"Perform the full compliment of examinations on the 17 accessible welds."

Evaluation: An earlier revision of this proposed alternative was authorized in an NRC SER dated November 1, 1990. The original evaluation concluded that because the subject welds are submerged in the suppression pool and are inaccessible, the code required examinations are impractical. The current revision of this request for relief documents the addition of one weld to those previously approved for relief. The addition of this weld does not change the bases of the original evaluation's technical justification for the authorization of the licensee's proposed alternative. Therefore, based upon the original SER evaluation, it is recommended that the proposed alternative remain authorized as previously determined, pursuant to 10 CFR 50.55a(g)(6)(i).

10. Request for Relief RR-IWC-3, Revision 1, Examination Category C-C, Item C3.20, Integral Welded Attachments on Class 2 Piping Submerged in the Suppression Pool

Code Requirement: Examination Category C-C, Item C3.20 requires a 100% surface examination of the integrally welded attachments on Class 2 piping as defined by Figure IWC-2500-5.

Licensee's Code Relief Request: In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required surface examinations of the following Class 2 integral attachment welds.

COMPONENT	LIMITATION
2CSH-25-05-SW301	Behind a leak channel under five feet of water in the suppression pool
2CSL-26-01-SW301	Behind a leak channel under five feet of water in the suppression pool
2RHS-66-13-FW316	Under water in the suppression pool
2RHS-66-13-FW317	Under water in the suppression pool
2RHS-66-13-SW301	Behind a leak channel under five feet of water in the suppression pool
2RHS-66-22-FW-310	Under water in the suppression pool
2RHS-66-22-FW-311	Under water in the suppression pool
2RHS-66-22-SW-301	Behind a leak channel under five feet of water in the suppression pool
2RHS-66-23-FW-313	Under water in the suppression pool
2RHS-66-23-FW-314	Under water in the suppression pool
2RHS-66-23-SW-301	Behind a leak channel under five feet of water in the suppression pool
2CSL-26-01-FW-313	Under water in the suppression pool
2CSL-26-01-FW-314	Under water in the suppression pool

Licensee's Basis for Requesting Relief (as stated):

"These welds are inaccessible for surface examination because they are located under water in the suppression pool. Greater access would require the redesign of the NMP2 containment and suppression systems.

"Technical Justification and Data to Support the Determination: The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. The population has increased to 13 through the first four fuel cycles. During the *interval's* attempts to examine scheduled weldments, eleven (11) more Category C-C integral attachments welds were found to be inaccessible for examination for the same and similar reasons. Five (5) of them were found to be shopwelds used to build penetration assemblies Z-5A, Z-5B, Z-5C, Z-12 and Z-15.

"This request has been revised to include those 11 additional examinations, and is hereby resubmitted for First Interval closure."

Licensee's Proposed Alternative Examination (as stated):

"None"

Evaluation: An earlier version of this Request for Relief was granted in an NRC SER dated November 1, 1990. The original evaluation concluded that because the subject welds are submerged in the suppression pool and are inaccessible, the Code-required examinations are impractical. The current revision of this Request for Relief adds eleven welds to those previously approved for relief. The addition of these welds does not change the bases of the original evaluation's technical justification for the granting of relief. Therefore, based upon the original SER evaluation, it is recommended that the current revision of this Request for Relief remain granted pursuant to 10 CFR 50.55a(g)(6)(i).

11. Request for Relief RR-IWC-5 Revision 1 (Part 1 of 3), Examination Categories C-A and C-B, Pressure-Retaining Vessel Welds and Pressure-Retaining Nozzle-to-Vessel Welds

Code Requirement: Examination Category C-A, Item C1.10 requires 100% volumetric examination of Class 2 pressure vessel shell circumferential welds as defined by Figure IWC-2500-1. Examination Category C-B, Item C2.21 requires 100% volumetric and surface examination on nozzle-to-shell (or head) welds as defined by Figure IWC-2500-4(a) or (b).

Licensee's Code Relief Request: In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required volumetric examination on the following welds.

Comp. ID/ Weld ID	Component Description	ASME Category	Item Number	Aggregate Coverage	Limitation
2RHS*E1A/ HW101A	Shell Circumferential Weld	C-A	C1.10	78% UT	Adjacent nozzle weld
2RHS*E1A/ HW102A	Nozzle to Shell Weld	C-B	C2.21	100% MT 80% UT	Adjacent flange weld

Licensee's Basis for Requesting Relief (as stated):

"Accessibility is limited due to permanent interferences.

"Technical Justification and Data to Support the Determination: The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. That SER granted relief on five (5) weldments. Utilization of the latest UT techniques, combined with the allowances contained in Code Case N-460 has reduced the number of weldments for which relief is currently sought to two (2), as NMPC achieved greater than 90% coverage on three (3) of the five (5) original examinations for which relief was sought in the first *interval*. Those items are not being resubmitted as Code required coverage was achieved. The remaining two (2) are resubmitted.

"This portion of the request for relief has been modified and is hereby resubmitted for First Interval closure."

Licensee's Proposed Alternative Examination (as stated):

"Perform volumetric and/or surface examination to maximum extent possible for each."

Evaluation: An earlier version of this Request for Relief was granted in an NRC SER dated November 1, 1990. The original evaluation concluded that due to permanent interferences with the subject welds, the Code-required examinations are impractical. The current revision of this Request for Relief documents the elimination of three welds (greater than 90% volumetric coverage was achieved on these welds) from those previously listed. In addition, the actual examination coverages achieved for the remaining two welds is documented. The elimination of three of the five welds does not change the bases of the original evaluation's technical justification for the granting of the licensee's request for relief. The licensee was able to obtain a significant portion (78%-80%) of the volumetric examination coverage of the remaining two welds. Consequently, it is concluded that the examinations performed would have detected any existing patterns of degradation, and reasonable assurance of the structural integrity of the welds has been achieved. Therefore, based upon the original SER evaluation, the volumetric coverage obtained and the impracticality of meeting the Code requirements, it is recommended that the current revision of this Request for Relief remain granted pursuant to 10 CFR 50.55a(g)(6)(i).

12.

13. Request for Relief RR-IWC-5 Revision 1 (Part 2 of 3), Examination Category C-C, Item C3.20, Integrally Welded Attachments on Piping, Examination Category C-F-1, Item C5.11, Pressure-Retaining Welds in Austenitic Stainless Steel Piping

Code Requirement: Examination Category C-C, Item C3.20 requires 100% surface examination of integrally welded attachments on Class 2 piping as defined by Figure IWC-2500-5. ASME Code Case N-408, Examination Category C-F-1, Item C5.11, requires 100% surface and volumetric examination of 7.5%, but not less than 28 welds, of all non-exempt Class 2 piping welds as defined by Figure IWC-2500-7.

Licensee's Code Relief Request: In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required volumetric and/or surface examinations of the following welds.

Comp. ID/ Weld ID	Component Description	ASME Category	Item Number	Aggregate Coverage	Limitation
2CSH-25-09- FW300	Integrally Welded Attachment to Piping	C-C	C3.20	55% surf.	Concrete structure
2CSH-25-09- FW30	Integrally Welded Attachment to Piping	C-C	C3.20	0% surf.	Permanent interferences
2CSH-25-09- FW300	Integrally Welded Attachment to Piping	C-C	C3.20	55% surf.	Concrete structure
2RHS-66-22- FW019	Circumferential Pipe Weld	C-F-1	C5.11	50% vol. 100% surf.	Permanent interferences result in one sided SS exam

Licensee's Basis for Requesting Relief (as stated):

"Accessibility is limited due to permanent interferences.

"Technical Justification and Data to Support the Determination: The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. That SER granted relief on 15 weldments. Utilization of the latest NDE techniques, combined with the allowances contained in Code Case N-460 have reduced the number of weldments for which relief is currently sought to four (4). First *interval* examinations revealed another inaccessible Category C-C weld. NMPC achieved greater than 90% coverage on 12 of the 15 original examinations for which relief is sought under the rationale presented in this part of this request for relief for the First Interval has decreased (from 15) to 4.

"This portion of the request for relief has been modified and is resubmitted for First Interval closure."

Licensee's Proposed Alternative Examination (as stated):

"Perform volumetric and/or surface examinations to maximum extent possible for each, and a VT-1 examination for 2CSH-25-09-FW303."

Evaluation: An earlier version of this Request for Relief was granted in an NRC SER dated November 1, 1990. The original evaluation concluded that due to permanent interferences with the subject welds, the Code-required examinations are impractical. The current revision of this Request for Relief documents the removal of 12 welds from those previously listed (greater than 90% volumetric examination was achieved on these 12 welds) and the addition of one weld not identified in the earlier version of the request. The elimination of twelve welds and the addition of one weld result in a total of four welds requiring relief. In addition, the actual examination coverages achieved for the four welds is documented. The elimination and addition of welds in this request does not change the bases of the original evaluation's technical justification for the granting of the licensee's request for relief. The licensee was able to obtain partial (50-100%) volumetric and/or surface examinations on three welds and no examination coverage on one weld. Consequently, it is concluded that the examinations performed would have detected any existing patterns of degradation, and reasonable assurance of the structural integrity of the welds has been achieved. Therefore, based upon the original SER evaluation, the surface and volumetric examination coverage obtained, and the impracticality of meeting the Code requirements, it is recommended that the current revision of this Request for Relief remain granted pursuant to 10 CFR 50.55a(g)(6)(i).

- M. Request for Relief RR-IWC-5 Revision 1 (Part 3 of 3), Examination Category C-G, Item No. C6.20, Examination of Valve Body Welds

Code Requirement: Examination Category C-G, Item C6.20 requires 100% surface examination of Class 2 valve body welds as defined by Figure IWC-2500-8. In the case of multiple valves of similar design, size, function, and service in a system, the examination of only one valve among each group of multiple valves is required. The examination may be performed from either the inside or outside surface of the component.

Licensee's Code Relief Request: In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required surface examination of the following valve body welds.

Comp. ID/ Weld ID	Component Description	ASME Category	Item Number	Aggregate Coverage	Limitation
2CSL*HCV118/V WHCV118-C	Valve Body Weld	C-G	C6.20	86%	Welded Attachment ¹
2CSL*HCV118/V WHCV118-D	Valve Body Weld	C-G	C6.20	86%	Welded Attachment
2CSL*HCV118/V WHCV118-LW	Valve Body Weld	C-G	C6.20	76%	Permanent interference
2CSL*HCV119/W VHCV119-C	Valve Body Weld	C-G	C6.20	60%	Permanent interference
2CSL*HCV119/W VHCV119-D	Valve Body Weld	C-G	C6.20	80%	Permanent interference
2CSL*HCV119/W VHCV119-LW	Valve Body Weld	C-G	C6.20	82%	Permanent interference
2CSL*MOV112/V WMOV112-C	Valve Body Weld	C-G	C6.20	80%	Permanent stiffener plate
2CSL*MOV112/V WMOV112-D	Valve Body Weld	C-G	C6.20	60%	Permanent stiffener plate
2CSL*MOV112/V WMOV112-LW	Valve Body Weld	C-G	C6.20	87%	Permanent interference
2CSL*V121/ VWV121-C	Valve Body Weld	C-G	C6.20	80%	Permanent interference
2CSL*V121/ VBW121-LW	Valve Body Weld	C-G	C6.20	87%	Permanent interference
2RHS*MOV1C/ VWMOV1C-C	Valve Body Weld	C-G	C6.20	70%	Permanent stiffener plate
2RHS*MOV1C/ VWMOV1C-D	Valve Body Weld	C-G	C6.20	84%	Permanent stiffener plate
2RHS*MOV1C/ VWMOV1C-LW	Valve Body Weld	C-G	C6.20	81%	Permanent interference

¹ Information obtained from SER Dated November 1, 1990

Comp. ID/ Weld ID	Component Description	ASME Category	Item Number	Aggregate Coverage	Limitation
2RHS*MOV2A/ VWMOV2A-C	Valve Body Weld	C-G	C6.20	60%	Permanent stiffener plate
2RHS*MOV2A/ VWMOV2A-D	Valve Body Weld	C-G	C6.20	80%	Permanent interference
2RHS*V378/ VWV378-LW	Valve Body Weld	C-G	C6.20	81%	Permanent interference
2RHS*MOV8A/ VWMOV8A-C	Valve Body Weld	C-G	C6.20	60%	Permanent interference
2RHS*MOV8A/ VWMOV8A-D	Valve Body Weld	C-G	C6.20	80%	Permanent interference
2RHS*V376/ VWV376-LW	Valve Body Weld	C-G	C6.20	82%	Permanent interference

Licensee's Basis for Requesting Relief (as stated):

"Accessibility is limited due to permanent interferences.

"Technical Justification and Data to Support the Determination: The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. The population has increased to 24 through the first four fuel cycles. Recategorization and deselection of three (3) examinations, as well as utilization of the 10% allowance contained in Code Case N-460 for one (1) examination, had reduced the number of weldments for which relief was sought from eleven (11) to seven (7). However, the incomplete examination of 13 additional Cat. C-G Item C6.20 examinations during the *interval* brought the total back up to 20. These four (4) items are not being resubmitted as Code required coverage was achieved. The remaining 20 (7 original and 13 additional) are resubmitted/submitted for First Interval closure.

"Part 3 of 3 of this request has been modified and is hereby resubmitted for First Interval closure."

Licensee's Proposed Alternative Examination (as stated):

"Perform surface examinations to maximum extent possible for each."

Evaluation: An earlier version of this Request for Relief was granted in an NRC SER dated November 1, 1990. The original evaluation concluded that due to permanent interferences with the subject welds, the Code-required examinations are impractical. The current revision of this Request for Relief documents the removal of four welds from those previously granted relief (greater than 90% volumetric examination was achieved on one weld and three other welds were declassified) and the addition of 13 welds. The elimination of four welds and the addition of 13 welds results in a total of 20 welds requiring relief. In addition, the actual examination coverages achieved for the welds is documented. The elimination and addition of welds in this request does not change the

bases of the original evaluation's technical justification for the granting the licensee's request for relief. The licensee was able to obtain a significant portion (60%-87%) of the surface coverage of the subject welds. Consequently, it is concluded that the examinations performed would have detected any existing patterns of degradation, and reasonable assurance of the structural integrity of the welds has been achieved. Therefore, based upon the original SER evaluation, the surface examination coverage obtained and the impracticality of meeting the Code coverage requirements, it is recommended that the current revision of this Request for Relief remain granted pursuant to 10 CFR 50.55a(g)(6)(i).

N. Request for Relief RR-IWD-1, Exemption from VT-3 Visual Examination of Integral Attachments and Supports for Class 3 Pressure-retaining Piping Downstream of the Last Shutoff Valve on Open-Ended Systems

Note: This Request for Relief was authorized in NRC SER dated November 1, 1990. The licensee has used this relief as authorized throughout the interval, and has resubmitted the Request for Relief with no changes for First Interval closure.

Code Requirement: Paragraph IWD-2520 requires that integral attachments for component supports and restraints within the boundary of each system specified in Examination Categories of Table IWD-2500-1 shall be subject to the VT-3 visual examination of IWA-2213.

Licensee's Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(i), the licensee proposed to exempt the VT-3 examinations of integral attachments on piping downstream of the last shutoff valves on open-ended systems.

The licensee stated:

"The piping down stream of the last shutoff valves on open-ended systems will simply be exempted from VT-3 examination of its integral attachments (and supports), provided the piping does not contain water during normal operations. This portion will (continue to) receive pressure tests in accordance with the requirements of the Code."

Licensee's Basis for Proposed Alternative (as stated):

"The same as that which was accepted by NRC in the above referenced SER dated November 1, 1990. Code Case N-408 had been approved for use by NRC, and has since been incorporated into the 1989 Code. That Code Case (and therefore that edition of the Code) allows for the exempting of Class 2 *piping and other components of any size beyond the last shutoff valve in open ended portions of systems that do not contain water during normal plant operating conditions (i.e., reactor startup, operation at power, hot standby, and reactor cooldown to cold shutdown conditions, but not test conditions.)* NMPC is of the opinion that it is not the intent of the Code to be more stringent in the area of Class 3 exemptions than it is in the area of Class 2 exemptions. Therefore, this exemption should be allowed for Class 3 piping also.

NMP2 has utilized this granted relief throughout the *interval*, and hereby resubmits it for First Interval closure."

Evaluation: This Request for Relief was evaluated and authorized in NRC SER dated November 1, 1990. The original evaluation concluded that it was not the intent of the ASME Code for Class 3 exemptions to be more stringent than Class 2 exemptions. Therefore it was determined that exempting the subject integral attachments and supports of the Class 3 piping downstream of the last shutoff valve on open-ended systems would not significantly affect plant quality or safety.

The licensee has used this relief as authorized in SER dated November 1, 1990 throughout the interval, and has resubmitted the Request for Relief with no changes for First Interval closure. Therefore, based upon the original SER evaluation and authorization, it is recommended that this Request for Relief remain authorized pursuant to 10 CFR 50.55a(a)(3)(i).

O. Request for Relief RR-IWF-1, Examination Category F-C, Item F3.50, Spring Type Supports, Constant Load Type Supports, Shock Absorbers, and Hydraulic and Mechanical Type Supports

Note: This request for relief was authorized in an NRC SER dated November 1, 1990. The licensee has used this relief as authorized throughout the interval, and has resubmitted the Request for Relief with no changes for First Interval closure.

Code Requirement: Examination Category F-C, Item F3.50 requires a 100% visual (VT-4) examination of spring type supports, constant load type supports, shock absorbers, and hydraulic and mechanical type snubbers as defined by Figure IWF-1300-1.

Licensee's Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(i), the licensee proposed to combine VT-3 and VT-4 examinations into one examination.

The licensee stated:

"The examination method applicable to those component supports selected for examination during the first ten-year inspection interval will be limited to VT-3. The VT-3 method used a NMP2 will incorporate the requirements found in the definition of VT-4 as addressed in the 1983 Edition with 1983 Addenda of Section XI."

Licensee's Basis for Proposed Alternative (as stated):

"NMPC proposes to combine the examination requirements of both the VT-3 and VT-4 methods into one examination method known as VT-3. The definition of VT-3 as it applies to NMP2, and the VT-3 procedure to be used at NMP2, will incorporate the operability, functional adequacy, verification of settings and freedom of motion aspects of the current VT-4 method.

"This Relief Request was utilized in its entirety during the First Interval and is submitted for First Interval closure."

Evaluation: This Request for Relief was evaluated and authorized in NRC SER dated November 1, 1990. The original evaluation concluded that the licensee proposed alternative was/is equivalent to the code requirements. Therefore it was concluded that the proposed alternative would ensure an acceptable level of inservice structural integrity.

The licensee has used this relief as authorized in SER dated November 1, 1990 throughout the interval, and has resubmitted the Request for Relief with no changes for First Interval closure. Therefore, based upon the original SER evaluation and authorization, it is recommended that this Request for Relief remain authorized pursuant to 10 CFR 50.55a(a)(3)(i)

P. Request for Relief RR-IWF-4, IWF-5400, Inservice Testing of Snubbers.

Note: This request for relief was authorized in an NRC SER dated October 24, 1990. The licensee has used this relief as authorized throughout the interval, and has resubmitted the Request for Relief with no changes for First Interval closure.

Code Requirement: IWF-5400 requires that a representative sample of 10% of the total number of nonexempt (IWF-1230) snubbers whose load rating is less than 50kips shall be tested each inspection period.

Licensee's Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(i), the licensee proposed to use the NMP2 Technical Specification 3/4.7.5 snubber functional test program.

The licensee stated:

"NMP2 requests relief from functional testing in accordance with ASME Section XI, B&PV Code, IWF-5000 in favor of the NMP2 Technical Specification 3/4.7.5 snubber functional test program."

Licensee's Basis for Proposed Alternative (as stated):

"In addition to the ASME functional test requirements of IWF-5400 described above, an augmented inservice inspection program on snubbers, as specified by Nine Mile Point Unit 2 Technical Specifications is also required (T.S. 3/4.7.5). Relief from ASME XI requirements is justified on the basis that Technical Specifications functional testing provides the necessary assurance for snubber operability. The proposed program would also test snubbers in excess of the 50 Kip rating, which is not currently required by ASME, XI IWF - 5300. The functional test acceptance criteria for Technical Specifications and IWF-5000 are identical.

"Snubber functional test sampling criteria shall be performed per Technical Specification 3/4.7.5, as follows:

- (a) 10% of the total of each snubber. For each snubber not meeting the Acceptance Criteria of 4.7.5.f(1), (2), an additional sample of at least $\frac{1}{2}$ the size of the original sample shall be functionally tested, until the total number tested is equal to the initial sample size multiplied by $1 + c/2$ where c = the number of failed snubbers or all snubbers in the failure type have been tested; or
- (b) An initial sample of 37 of each type of snubbers shall be functionally tested in accordance with T.S. figure 4.7.5-1. "C" is the total of failed snubbers, "N" is the cumulative number of a type of snubber tested. When the point plotted falls into the 'Accept' region of T.S. figure 4.7.5 - 1, testing may be terminated

"Early plant designs had a much smaller number of snubbers. The original ASME Code percentage of 10% was judged to be a practical sampling plan to detect failures for these early plant designs. NMP2 has approximately 1500 Technical Specification snubbers, of which 750 are also ASME XI 'non-exempt'. The above mentioned sampling programs provide a more practical alternative for plants which have large numbers of snubbers. It allows for a reduction in the total number of tests without a

significant reduction in confidence level. The criteria used for selection and additional tests take into consideration design and operating factors of the systems.

Evaluation: This Request for Relief was evaluated and authorized in NRC SER dated October 24, 1990. The staff's evaluation concluded that the licensee's proposed alternative was/is comparable to the code requirements. Therefore it was concluded that the proposed alternative would provide an acceptable level of quality and safety.

The licensee has used this relief as authorized in SER dated October 24, 1990 throughout the interval, and has resubmitted the Request for Relief with no changes for First Interval closure. Therefore, based upon the original SER evaluation and authorization, it is recommended that this Request for Relief remain authorized pursuant to 10 CFR 50.55a(a)(3)(i).

Q. Request for Relief RR-IWB-13, Examination Category B-G-1, Item B6.40, Pressure-retaining Bolting, Greater Than 2 Inch In Diameter

Code Requirement: Examination Category B-G-1, Item B6.40 requires 100% volumetric examination of the threads in the reactor pressure vessel flange as defined by Figure IWB-2500-12.

Licensee's Code Relief Request: In accordance with 10 CFR 50.55a(g)(5)(iii), the licensee requested relief from the Code-required volumetric examination of reactor pressure vessel flange threads 2RPV-TF001 through 2RPV-TF076

Licensee's Basis for Requesting Relief (as stated):

"The groove, which the o-ring seal is placed in, limits the accessibility of the transducers used to ultrasonically interrogate this base material. As a result, 100% volumetric interrogation is deemed impractical.

"NMP2 has considered the consequences of a failure of this system and finds that, due to the conservatism of design inherent to the reactor pressure vessel, catastrophic failure of this component is considered highly unlikely (as reflected in the FSAR design basis accident.) Therefore, further analysis of the consequences of failure of the reactor pressure vessel flange threads is not required. Examination of the flange ligament areas will be performed to the maximum extent possible for each of the 76 ligament areas, i.e., CRV=90.2%.

"NMP2 expects no changes in the overall level of plant quality and safety based on performing the subject examinations to the maximum extent possible.

"This new Relief Request is submitted for initial review, approval and First Interval closure.

Licensee's Proposed Alternative Examination (as stated):

"These examinations document interrogated volumes greater than 90%, but less than 100%, in all cases. There are no additional techniques that could be utilized to increase the volume examined for each of the ligament areas."

Evaluation: The Code requires 100% volumetric examination of the threads in the RPV flange. The licensee states that component geometry—specifically, the O-ring seal groove on the reactor vessel flange—limits access and precludes complete volumetric examination of the threaded portions of the flange.

To complete the Code-required volumetric examination, design modifications of the RPV would be necessary. Therefore, the Code-required volumetric examination of the flange threads is impractical. Imposition of the requirement would create a significant burden on the licensee.

The licensee has examined a significant portion (90.2%) of the Code-required volume of the identified RPV flange threads. Based on the significant amount of examination obtained, it is reasonable to conclude that any patterns of degradation, if present, would have been detected. It should also be noted that Code Case N-460, Alternative Examination Coverage for Class 1 and Class 2 Welds, approved in Regulatory Guide 1.147, allows for a reduction in examination volume of less than 10% for Class 1 and Class 2 welds, provided the reduction in coverage is due to interference or part geometry. While the RPV flange threads are not welds, the INEEL staff believes that the concept of *greater than 90% coverage* being acceptable for Class 1 and Class 2 welds is also applicable to other components. Therefore, the 90.2% volumetric examination obtained is "essentially 100% examination" and provides reasonable assurance of structural integrity.

Based on the impracticality of meeting the Code's volumetric examination requirements for the subject components, and the reasonable assurance of structural integrity provided by the examinations that have been performed, it is recommended that relief be granted pursuant to 10 CFR 50.55a(g)(6)(i).

R. Request for Relief RR-IWF-5, IWF - Class 1, 2, and 3, IWD - Class 3, Visual Examination of Component Supports

Code Requirement: Table IWF-2500-1 requires visual examination (VT-3) of Class 1, 2, and 3 plate and shell type supports, linear type supports and component standard supports. Table IWD-2500-1 requires visual examination (VT-3) of Class 3 integral attachments.

Licensee's Proposed Alternative: In accordance with 10 CFR 50.55a(a)(3)(ii), the licensee proposed to perform VT-3 examination of Class 1, 2, and 3 supports and Class 3 Integral attachments without insulation removal. The licensee stated:

"VT-3 examination of all Class 1, 2, & 3 supports and Class 3 Integral Attachments will be performed without insulation removal. The VT-3 examiners look at all uninsulated portions of the supports and any portion of the Integral Attachments that may be visible. Careful scrutiny is given to insulation at the interface with the support, looking for signs of structural distress on the insulation or covering that may be indicative of loss of

support integrity. If such indications are found, the insulation will then be removed for a more detailed inspection.

Licensee's Basis for Proposed Alternative (as stated):

"Removal of insulation to perform the VT-3 examination requires significant resources and radiation exposure without a compensating increase in the safety or integrity of the supports and associated Class 3 Integral Attachments.

"The recommended substitute VT-3 examination is capable of identifying component support deformation (broken, bent or pulled out parts) as well as signs of structural integrity of the support. Examination results since 1993 have proven this method to be effective based upon the results documented in the 90 Day Reports submitted to the NRC after RFO's 3, 4 and 5.

"During RFO-1 and RFO-2 (through 1992), insulation was removed for examination of all supports and Class 2 Integral Attachments. Approximately 40% of all supports and Class 3 Integral Attachments welds were examined with the insulation removed. Since October 1993, the above recommended substitute has been implemented for the remainder of the supports and Integral Attachments. All but 82 of the 256 Class 3 Integral Attachments were examined during the first interval with insulation either removed or with no insulation installed.

"ASME Code Case N-491 was approved by ASME in March 1991 and by the NRC in R.G. 1.147, Rev. 10 in October 1993, which lessened the required exam scope to a sampling basis of 25% of Class 1, 15% of Class 2, and 10% of Class 3 supports over a ten year interval. NMP2 exceeded that sampling basis with full insulation removal in its first two refueling outages (covering the First and one half of the Second inspection periods) and further completed the remaining support population (without insulation removal) in the remainder of the Second and Third inspection periods.

"ASME Code Case N-509 was approved by ASME in November 1992 and is included in the draft of R.G. 1.147, Rev. 12, which is out for public comment prior to final acceptance and publication. NMPT2 has exceeded the recommended ten year interval scope of examinations with insulation removed for Class 3 Integral Attachments in its first two refueling outages, having completed 43% vs. the recommended 10% per the code case and an additional 25% over the remainder of the interval that were accessible without insulation removal. The remaining Class 3 Integral Attachments (32%) were examined over the second and third inspection periods with the insulation in place. One hundred percent of the required surface examinations were performed on all Class 1 and 2 Integral Attachments per the 1983 Edition of ASME Section XI requirements.

"Based upon the examinations performed with insulation removed (as documented above), and the applicable changes in ASME Section XI Code requirements, it is concluded that the proposed alternative examinations performed since 1993 ensure an acceptable level of inservice structural integrity and are in compliance with the intent of these changes. Compliance with original code requirement would result in unwarranted

difficulties, including scaffolding, construction and removal, insulation removal and replacement and a commensurate increase in radiation exposure without a compensating increase in the level of quality and safety.

“This Relief Request is submitted for approval and First Interval closure.”

Evaluation: Table IWF-2500-1 requires visual examination (VT-3) of Class 1, 2, and 3 plate and shell type supports, linear type supports and component standard supports. Table IWD-2500-1 requires visual examination (VT-3) of Class 3 integral attachments.

The licensee is seeking relief from removal of insulation from the component supports and integral attachments requiring visual examination. For the licensee to perform the Code-required visual examinations with the insulation removed, plant personnel would be exposed to excessive radiation levels in the process of insulation removal. Therefore, the Code requirement, to perform the visual examinations with insulation removed, presents a substantial hardship for the licensee.

Through 1992, the licensee removed insulation from all supports and Class 3 integral attachments examined. Since October of 1993, the licensee has performed VT-3 examinations of Class 1, 2, and 3 supports and Class 3 integral attachments with insulation in place. Approximately 40% of all supports and Class 3 integral attachments examined during the first-ten year interval have been examined with insulation removed. Examinations performed with insulation in place resulted in the examiners looking at all uninsulated portions of the supports and integral attachments that were visible. Areas of insulation showing signs of structural distress which might be indicative of loss of support integrity were removed for a more detailed inspection.

The requirements of ASME Section XI implicitly assume that insulation will be removed to perform volumetric and surface examinations. In general this would also apply to mechanical and welded support connections. The requirements of ASME Section XI do not require removal of insulation that would result in a violation of the Technical Specifications, such as solid fire-resistant foam assemblies or insulation located at fire stops.

Based on the visual examinations performed to date on the subject components, and the staff's opinion that insulation need not be removed to perform all of the Code-required VT-3 examinations, it is determined that reasonable assurance of structural integrity is maintained for the subject components. Therefore, it is recommended that the licensee's proposed alternative be authorized pursuant to 10CFR50.55a(a)(3)(ii).

3. CONCLUSION

The INEEL staff evaluated the licensee's submittal and concluded that certain inservice examinations cannot be performed to the extent required by the Code at the Nine Mile Point, Unit 2.

The INEEL staff reviewed the licensee's submittals and concludes that for Request for Relief RR-IWB-1, Revision 1, the licensee's proposed alternative to the Code requirements provide an acceptable level of quality and safety. Therefore, it is

recommended that the proposed alternative remain authorized pursuant to 10 CFR 50.55a(a)(3)(i).

For Requests for RR-IWB-11, Revision 1, RR-IWB-12, Revision 2, RR-IWC-1, Revision 1, and RR-IWF-5, it is concluded that the Code requirements would result in a hardship without a compensating increase in the level of quality and safety. Therefore, it is recommended that these proposed alternatives remain/be authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

For Requests for Relief RR-IWB-2, Revision 1, RR-IWB-3, Revision 1, RR-IWB-6, Revision 2, RR-IWB-7, Revision 1, RR-IWC-2, Revision 1, RR-IWC-3, Revision 1, RR-IWC-5, Revision 1 (Parts 1, 2, and 3), and RR-IWB-13, it is concluded that the Code requirements are impractical for the subject welds. Therefore, it is recommended that relief remain/be granted pursuant to 10 CFR 50.55a(g)(6)(i).

Requests for Relief RR-IWD-1, RR-IWF-1, and RR-IWF-4 were previously authorized in SER's dated November 1, 1990 and October 24, 1990 and not re-evaluated in this report.