

March 24, 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 NOS. 1 AND 2 - REQUEST FOR
ADDITIONAL INFORMATION ON RELIEF REQUEST DATED OCTOBER 28,
1999 (TAC NOS. MA7116, MA7117 AND MA7118)

Dear Mr. Mueller:

By letters dated October 28, 1999 and January 13, 2000, you submitted proposed alternatives to the IWE/IWL containment inspection requirements for Nine Mile Point Nuclear Station, Unit Nos. 1 and 2 first 10-year containment inspection interval. You propose to use the 1998 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Subsections IWE and IWL, in lieu of the 1992 Edition with 1992 Addenda, as currently specified by 10 CFR 50.55a(g)(6)(ii)(B) for containment inspections. With technical assistance from the Idaho National Engineering and Environmental Laboratory we have evaluated your submittals and determined that the enclosed request for additional information is needed to complete the review of the subject requests for relief. We have discussed these questions with your staff in a telephone conference on March 13, 2000. Your staff stated that they planned to respond by April 15, 2000.

If you have any questions regarding this matter, please contact me at 301-415-1451.

Sincerely,

/RA/

Peter S. Tam, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and 50-410

Enclosure: As stated

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION
ON THE FIRST 10-YEAR CONTAINMENT INSPECTION INTERVAL

REQUESTS FOR RELIEF

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT, UNITS 1 AND 2

DOCKET NUMBERS: 50-220 AND 50-410

By letters dated October 28, 1999 and January 13, 2000, the licensee, Niagara Mohawk Power Corporation (NMPC), submitted proposed alternatives to the IWE/IWL containment inspection requirements for Nine Mile Point, Units 1 and 2 first 10-year containment inspection interval. The licensee proposed to use the 1998 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (ASME Code), Section XI, Subsections IWE and IWL, in lieu of the 1992 Edition with 1992 Addenda, as currently specified by 10 CFR 50.55a(g)(6)(ii)(B) for containment inspections. The NRC staff with the technical assistance from the Idaho National Engineering and Environmental Laboratory (INEEL) staff has evaluated the licensee's submittals and determined that the following information is required to complete the review of the subject requests for relief. The first 10-year containment inspection interval began September 9, 1996, for Nine Mile Point, Units 1 and 2.

1. The 1998 Edition of the ASME Code Section XI invokes IWA-2000, *Examination and Inspection*, when defining the general requirements for examinations to be performed, and for the qualification of examination personnel. The licensee's proposed alternative removes the IWA-2300 requirement to certify NDE personnel to CP-189. In addition, new 1998 Code examinations (General Visual and Detailed Visual) have been introduced. The definition of the new Code examinations has been left up to individual licensees, and a licensee would be allowed to define how personnel performing these examinations are to be qualified. It is presently unclear how owner-defined visual examination programs, including items such as illumination and resolution requirements, acceptance criteria, and minimum personnel qualifications, may be individually developed and the necessary level of consistency maintained industry-wide. To establish that the proposed alternative provides an acceptable level of quality and safety, details of the NMP General and Detailed Visual examination program, addressing both IWE and IWL components, must be evaluated. Please describe the visual examination program, including attributes such as:
 - (1) The owner-defined acceptance criteria that will be used with the Detailed Visual examination.
 - (2) The qualification requirements for personnel performing containment visual and ultrasonic examinations including a technical discussion comparing the qualification requirements being used at NMP to the qualification requirements contained in CP-189.

2. The licensee stated that resolution and illumination requirements for General and Detailed Visual examination procedures will be qualified similar to VT-1 and VT-3 procedure qualifications. In addition, the licensee stated that for applications where remote visual examination systems are to be used, those systems will be demonstrated to have a resolution capability at least equivalent to that attainable by direct visual examination, and that the procedure will be "...demonstrated to the authorized nuclear inservice inspector for capability to detect flaws and degradation levels defined within the procedure". However, it is not clear how procedures will be demonstrated. 10 CFR 50.55a(b)(2)(x)(B) requires the qualification of remote visual examinations. Describe the requirements for qualifying the IWE visual examination procedures and how illumination and resolution requirements will be established and implemented.
3. The IWE-2500(b) requirement to examine paint or coatings prior to removal has been eliminated from the 1998 Edition. Alternatively, the licensee referred to their maintenance rule program to address degradation of paint and coatings. However, it is not clear how the maintenance rule program compares to inservice inspection related visual examinations (i.e., examiner qualifications, frequency of examinations, etc.). This alternative may be considered acceptable if comparable to Code requirements and/or when adequate provisions exist to examine the base metal for surface anomalies that may indicate underlying conditions which could challenge the structural integrity of containment. These examinations should be performed prior to re-application of the coating, and should invoke detailed visual examinations and/or augmented ultrasonic examination, as necessary. Provide specific information addressing the maintenance rule program or how the integrity of the base metal is confirmed prior to paint or coating application.
4. Examination Category E-G, Pressure Retaining Bolting, has been removed from Table IWE-2500-1 in the 1998 Edition. The 1992 Edition required VT-1 visual examination of bolting when a connection was disassembled. The 1998 Edition requires a general visual examination, performed in place, with no requirement for visual examination when the joint is disassembled. It is not clear what, if any, examinations will be performed on disassembled bolted connections. Provide a technical justification describing why not performing VT-1 visual examination of the bolting, when disassembled, provides an acceptable (equivalent) level of quality and safety.