



Boston Edison

Pilgrim Nuclear Power Station
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Senior Vice President - Nuclear

July 12, 1996
BECo Ltr. #2.96- 067

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Docket No. 50-293
License No. DPR-35

Revised Pilgrim Relief Request (PRR) - 24,
Pilgrim Third Ten-Year Inservice Inspection (ISI) Program

The attachment to this letter provides our revised PRR - 24 for NRC approval. This revision includes clarifications on our implementation of ASME Section XI, Appendix VII requirements as discussed in a telephone call on June 21, 1996, with the NRC, Boston Edison Company (BECo), and the Idaho National Engineering Laboratory. This relief request relates to our Third Ten-Year ISI Program submitted to the NRC by BECo Letter # 95-091, dated September 1, 1995.

BECo previously requested relief from implementing Appendix VII until the performance demonstration requirements of Appendix VIII are fully implemented. Since the NRC has not endorsed Appendix VIII and was planning to deny our relief request, we have decided to revise our relief request and fully implement Appendix VII requirements.

Our Third Ten-Year ISI interval began on July 1, 1995, and the annual training for our Nondestructive Examination (NDE) personnel should have been completed by June 30, 1996, to meet the Appendix VII requirements. Since the required NDE instructor training course is not readily available, we require relief from the annual training requirement of Appendix VII, Paragraph VII-4230, from July 1995 to December 1996. We will be in full compliance with Appendix VII by June 1997, for the subsequent annual training as explained in the attached revised relief request.

If you have any questions regarding the information contained in this letter, please contact Walter Lobo at (508) 830-7940.

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for *E. T. Boulette, PhD*
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Attachment

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Senior Resident Inspector
Pilgrim Nuclear Power Station

RELIEF REQUEST NUMBER: PRR-24

REVISION 1

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COMPONENT IDENTIFICATION

Code Classes: 1 and 2

References: IWA-2311(b) and Appendix VII

Examination Categories: B-A, B-D, B-F, B-G-1, B-J, B-M-1, B-O
C-A, C-B, C-F-1, C-F-2

Item Numbers: B1.11, B1.12, B1.21, B1.22, B1.30, B1.40, B2.90, B3.100, B5.10,
B5.130, B6.20, B6.30, B6.40, B6.180, B9.11, B9.12, B9.31,
B12.40, B14.10

C1.10, C1.20, C5.11, C5.51

Description: Exemption from the schedule requirement of Appendix VII,
Paragraph VII-4240, Annual Training

Component Numbers: All Class 1 and 2 components requiring ultrasonic examination

CODE REQUIREMENT

Sub-paragraph IWA-2311(b) specifies that the training, qualification, and certification of ultrasonic examination personnel shall also comply with the requirements of Appendix VII.

Appendix VII provides requirements for the employer's written practice, qualification of ultrasonic examiners, qualification records, and the minimum content of initial training courses for the ultrasonic examination method in addition to those required in SNT-TC-1A.

BASIS FOR RELIEF

Our Third Ten-Year Inservice Inspection interval began on July 1, 1995, and the annual training for our NDE personnel should be complete by June 30, 1996, to comply with Paragraph VII-4240. Since we do not have an instructor qualified to Paragraph VII-4140 and the next readily available course is in November 1996, it was not practical to meet the annual training requirements by June 30, 1996. Thus, Boston Edison requests relief from the schedule from July 1995 to December 1996, to comply with the annual training requirement of Appendix VII, Paragraph VII-4240.

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REVISION 1 (Cont)

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The training and certification program to comply with Appendix VII will be fully implemented by June 1997. The program includes course material, procedures and test specimens. We are revising our training and certification procedure (Quality Assurance Department Procedure No. 10.09) to meet the requirements of Appendix VII. An individual will complete NDE instructor training in November 1996, and we will be in compliance with the subsequent annual training requirements beginning June 1997.

PROPOSED ALTERNATE PROVISIONS

The Enclosure provides a summary of BECo qualified ultrasonic examination personnel. These personnel currently comply with ASME Section XI requirements for ultrasonic qualifications in accordance with Subarticle IWA-2310 and code interpretation X1-1-92-42 which recognize the continuity of existing certifications. Thus, BECo fully complies with ASME Section XI by using the provisions of Subarticle IWA-2310.

As an alternative to meeting the annual training requirement of Paragraph VII-4240, BECo NDE personnel are scheduled in 1996 for a 40-hour ultrasonic course in ASME XI examination methods. The course does not qualify to Appendix VII provisions since the instructors are not code defined NDE instructors pursuant to Paragraph VII-4140. This 40-hour specialized course is considered to be an equal substitute for the 10-hour annual training by a qualified NDE instructor because the course duration, materials and instructor's credentials are at least equivalent to code requirements, resulting in an equal level of quality and safety in the ISI examinations.

The 40-hour ultrasonic course and the existing certification of BECo NDE personnel provide adequate basis for conducting the on-line ISI examinations beginning October 1996. Further, the Appendix VII requirements for Refueling Outage (RFO) #11 examinations, currently planned for February 1997, will be met through the use of qualified BECo contractor personnel. The alternate provision does not impact quality or safety, since ASME Section XI requirements will be met by complying with Paragraphs IWA-2310 and VII-4240 for ISI examinations. Thus, the relief request meets the requirement of 10 CFR 50.55a(a)(3)(i) in that an acceptable level of quality and safety is maintained.

APPLICABLE TIME PERIOD

Relief is requested for the Third Ten-Year interval of the Pilgrim Station Inservice Inspection Program beginning July 1, 1995 till December 1996 for implementing annual training requirements.

Enclosure: Summary of Boston Edison Company NDE Qualified Personnel

ENCLOSURE TO PRR-24

Summary of Boston Edison Company NDE Qualified Personnel

Three individuals are certified in ASME Section XI ultrasonic examination methods at Boston Edison Company. Below is a summary of their qualifications.

Individual A

- Certified from 1972 to 1982 as UT Level II while in the U.S. Navy and Stone & Webster Engineering Corporation.
- Certified as an ASNT Level III from 1982 to present (by examination).
- Certified as a BECo NDE Level III from 1983 to present (by examination).
- Documented classroom training in ultrasonic examination is 209 hours.

Individual B

- Certified as a NDE Level III from 1980 to present while employed at Stone & Webster Engineering Corporation, Yankee Atomic Electric Company and Boston Edison Company (by examination).
- Certified as an ASNT Level III from 1984 to present (by examination).
- Documented classroom training in ultrasonic examination is 84 hours.

Individual C

- Certified as a Level I in 1992 at Boston Edison Company.
- Certified as a Level II in 1995 at Boston Edison Company.
- Documented classroom training in ultrasonic examination is 160 hours.