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**James Knubel**  
Senior Vice President and  
Chief Nuclear Officer

March 27, 2000  
JPN-00-008

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

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket 50-333  
**Third Ten Year Inservice Inspection Interval:**  
**Relief Request to Allow Use of ASME Code Case N-546 (RR #21)**

Reference: NRC letter to South Texas Project Nuclear Operating Company, "South Texas Project, Units 1 and 2 (STP) - Second 10 Year Interval Inservice Inspection Program Plan – Request to Use ASME Section XI Code Case N-546 (RR-ENG-2-9) (TAC Nos. MA5451 and MA5452)," dated July 8, 1999.

Dear Sir:

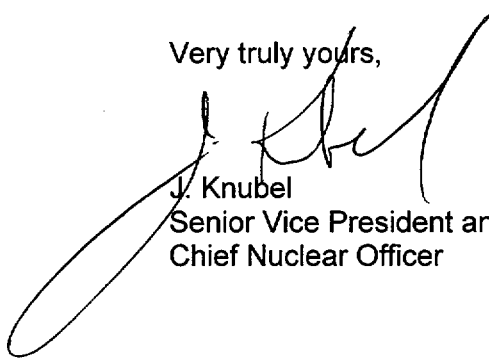
Pursuant to the provisions specified in 10 CFR 50.55a(g)(5)(iii) and in accordance with 10 CFR 50.55a(a)(3)(i), this submittal requests relief from certain requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for James A. FitzPatrick. Specifically, relief is requested to allow the use of ASME Code Case N-546 instead of the qualification and certification requirements for VT-2 visual examination personnel found in IWA-2300. A similar relief request was approved by the NRC staff for the South Texas Project (Reference).

Attachment I contains the basis for this relief request. The Authority would like to use this relief in the upcoming refueling outage (RO 14) at FitzPatrick, and therefore requests disposition of this relief request prior to September 1, 2000.

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This letter contains no new commitments. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,



J. Knubel  
Senior Vice President and  
Chief Nuclear Officer

Attachment: As stated

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

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U.S. Nuclear Regulatory Commission  
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Mr. Guy Vissing, Project Manager  
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Attachment I to JPN-00-008

**Relief Request to Allow Use of ASME Code Case N-546**  
(Relief Request #21)

NEW YORK POWER AUTHORITY  
JAMES A. FITZPATRICK NUCLEAR POWER PLANT  
DOCKET NO. 50-333  
DPR-59

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**Relief Request to Allow Use of ASME Code Case N-546 (Relief Request #21)**

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**Component Identification:**

Components subject to VT-2 visual examinations.

**Examination Requirements:**

ASME Section XI, 1989 Edition, Subsection IWA-2300 requirements for the qualification and certification of VT-2 visual examination personnel.

**Relief Requested:**

Relief is requested from the certification and qualification requirements, found in ASME Section XI, Subsection IWA-2300, for personnel performing VT-2 visual examinations.

**Basis for Relief:**

ASME Section XI, 1989 Edition, Subsection IWA-2300 requires that VT-2 visual examination personnel be qualified to and certified in accordance with ASNT SNT-TC-1A. The Code also requires that the examination personnel be qualified for near and far distance vision acuity. This relief request proposes to use ASME Code Case N-546 which contains alternate requirements for the certification and qualification of VT-2 visual examination personnel. The Authority believes that this alternative is acceptable pursuant to 10 CFR 50.55a(a)(3)(i) as it will provide an acceptable level of quality and safety.

As stated in Code Case N-546, plant personnel (e.g., licensed and non-licensed operators, system engineers, and testing technicians) with the specified training and plant walkdown experience need not be qualified nor certified to ASNT SNT-TC-1A or ASNT CP-189 requirements. Experience in identifying equipment problems and knowledge of operating conditions will enhance the ability of plant personnel to locate leakage during VT-2 examinations. With the specified four hours of training on Section XI requirements and plant specific procedures for VT-2 examinations, the designated plant personnel will understand how leaks should be identified and documented and be fully capable of performing VT-2 examinations. This 4 hours of training will be conducted every 3 years to maintain personnel qualification.

Qualifying personnel for VT-2 examinations under Code Case N-546 is less burdensome than qualifying and maintaining the present VT-2 certification. Adopting this Code Case makes it feasible to train more people to perform these tasks. Furthermore, using personnel who are already required to perform functions in the plant will reduce the number of people required to enter into those areas that have radiological restrictions, resulting in fewer plant workers being exposed to potential radiation dose and keeping radiation exposure as low as reasonably achievable.

Additionally, use of on-shift personnel will improve the process of returning systems to service. Prompt return of safety systems to service will improve the safety of the plant and the public.

**Alternative Examination(s):**

The Authority proposes the following alternative qualification requirements for VT-2 visual examination personnel:

- (a) At least 40 hours of plant walkdown experience, such as that gained by licensed and nonlicensed operators, local leak rate personnel, system engineers and inspection and nondestructive examination personnel;
- (b) At least four hours of training on Section XI requirements and plant specific procedures for VT-2 visual examination, which shall be conducted every 3 years; and
- (c) Vision test requirements of IWA-2321, 1989 Edition, which is the Code of Record for the JAF ISI Program.

Note: Documentation of the walkdown experience is a one time effort and will be maintained in the personnel qualification records.

**Implementation Schedule:**

The Authority would like to use this relief in the upcoming refueling outage (RO 14) at FitzPatrick, and therefore requests disposition of this relief request prior to September 1, 2000.