

April 14, 2000

MEMORANDUM TO: File Center

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

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT NO. 1 --
INSERVICE INSPECTION THIRD TEN-YEAR INTERVAL
RELIEFS (TAC NO. MA7129)

REFERENCE: Letters, J. T. Conway to NRC, October 30, 1999

By letter dated October 30, 1999, Niagara Mohawk Power Corporation (NMPC), submitted the Third Ten-Year Interval ASME Code Section XI Inservice Inspection (ISI) Program Plan, including relief requests. The staff's contractor INEEL found that additional information may be needed to complete the review. The purpose of this memorandum is solely to convey the draft questions (attached) to the public and the licensee. The questions do not currently state an NRC staff position nor do they represent a formal request for additional information (RAI). After reviewing the draft questions, the licensee may request to discuss them in a meeting or telephone conference; the formal disposition of these draft questions will be discussed then.

Attachment: As stated

Docket No. 50-220

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TECHNICAL LETTER REPORT
ON THE THIRD 10-YEAR INSPECTION INTERVAL
REQUESTS FOR RELIEF
FOR
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT, UNIT 1
DOCKET NUMBERS: 50-220

1.0 INTRODUCTION

By letter dated October 30, 1999, the licensee, Niagara Mohawk Power Corporation (NMPC), submitted requests for relief from the requirements of the ASME Code, Section XI, for the Nine Mile Point, Unit 1 third 10-year inservice inspection (ISI) interval. The Idaho National Engineering and Environmental Laboratory (INEEL) staff has reviewed the information provided by the licensee in the subject requests for relief.

A licensee may propose an alternative to CFR or Code requirements in accordance with 10 CFR 50.55a(a)(3)(i) or 10 CFR 50.55a(a)(3)(ii). When submitting a proposed alternative, the licensee must specify the appropriate regulatory basis. For example, 10 CFR 50.55a(a)(3)(i), requires that the proposed alternative be shown to provide an acceptable level of quality and safety, i.e., essentially be equivalent to the original requirement in terms of quality and safety. 10 CFR 50.55a(a)(3)(ii), requires that the licensee show that compliance with the original requirement results in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Examples of hardship and/or unusual difficulty include, but are not limited to, excessive radiation exposure, disassembly of components solely to provide access for examinations, and development of sophisticated tooling that would result in only minimal increases in examination coverage.

2.0 SCOPE

Inservice examination of components and system pressure tests conducted during 120-month inspection intervals must comply with the requirements of the latest edition and addenda of the Code incorporated 12 months prior to the start of the inspection interval. Therefore, the Code of record for the Nine Mile Point Unit 1, third 10-year ISI interval, which began December 26, 1999, is the 1989 Edition of Section XI of the ASME Boiler and Pressure Vessel Code.

The Idaho National Engineering and Environmental Laboratory (INEEL) staff has evaluated the licensee's submittal and determined that the following information is required to complete the review of the subject requests for relief.

2.1 **Relief Request ISI-5:** Due to limited access, the licensee has requested relief from performing 100% surface examinations on six Reactor Vessel Integrally Welded attachments as is required by Code Case N-509, Examination Category B-K, Item B10.10. However, the licensee has not provided information relating to the specific limitations associated with the components. Provide information (e.g., drawings, sketches, or descriptions) that specifies the limitations associated with the required surface examinations.

ATTACHMENT

2.2 **Relief Request ISI-6:** Examination Category B-O, Item B14.10 requires volumetric or surface examination on 10% of peripheral CRD housing welds, as defined by Figure

IWB-2500-18, each inspection interval. The licensee has requested relief from the Code-required surface or volumetric examination of the required peripheral CRD housing welds.

The licensee stated that there are 32 peripheral CRD Housings of which 10% or a total of three (3) are required to be examined during the interval. The licensee has proposed to perform partial surface examinations on six (6) of the peripheral control rod drive housings. The additional three (3) housing examinations will result in the same weld length being examined due to the fact that 180 degrees of each CRD housing is obstructed by adjacent CRD housings and hydraulic lines.

Similar requests for relief have been found acceptable provided the proposed cumulative alternative examination coverages on additional CRD's meet or exceed the Code-required coverage. As stated by the licensee, this approach was previously granted per USNRC Safety Evaluation, TAC No. M83099, dated April 6, 1994. However, upon review of the evaluation performed in 1994, it appears that the proposed alternative was approved for the partial examination of eight (8) of the peripheral control rod drive housings. In addition, the INEEL staff does not consider three (3) CRD's of 32 a 10% sample. In order to meet the Code requirement the licensee is required to examine four (4) of the peripheral CRD housings. Therefore eight (8) of the peripheral control rod drive housings would be required to be examined for 180 degrees each. Provide additional information concerning the sample size of peripheral CRD housings that will be examined.

2.3 **Relief Request ISI-10:** The licensee has proposed to implement Code Case N-573, *Transfer of Procedure Qualification Records Between Owners*. The licensee has stated in their proposed "Alternative Examination Or Test" portion of the Relief Request that:

1. "NMPC will perform a technical review of the supplying Owner's PQR.
2. "The supplying Owner will state in writing that the PQR was performed under an acceptable Nuclear Quality Assurance program that meets ASME Section XI, IWA-1400 and that it was performed in accordance with ASIVIE Section IX.
3. "NMPC will generate a NMPC; WPS using the variables established in the supplied PQR(s). NMPC PQR's may supplement these or other Owner supplied PQR's.
4. The WPS will be approved and signed by NMPC.
5. "The WPS will be demonstrated successfully by NMPC by completing a welder performance qualification test using the parameters of the NMPC WPS.
6. "NMPC will not transfer the supplied PQR to any other Owner.

7. NMPC will document the use of this Code Case on the appropriate NIS-2 form.”

It is unclear from the above seven items if the licensee has committed to the conditions listed in the subject Code Case N-573. Confirm that the conditions stated in the Code Case will be met as stated below.

- (a) The Owner that performed the procedure qualification test shall certify, by signing the PQR, that testing was performed in accordance with Section IX.
- (b) The Owner that performed the procedure qualification test shall certify, in writing, that the procedure qualification was conducted in accordance with a Quality Assurance Program that satisfies the requirements of IWA-1400.
- (c) The Owner accepting the completed PQR shall accept responsibility for obtaining any additional supporting information needed for WPS development.
- (d) The Owner accepting the completed PQR shall document, on each resulting WPS, the parameters applicable to welding. Each WPS shall be supported by all necessary PQR's.
- (e) The Owner accepting the completed PQR shall accept responsibility for the PQR. Acceptance shall be documented by the Owner's approval of each WPS that references the PQR.
- (f) The Owner accepting the completed PQR shall demonstrate technical competence in application of the received PQR by completing a performance qualification test using the parameters of a resulting WPS.
- (g) The Owner may accept and use a PQR only when it is received directly from the Owner that certified the PQR.
- (h) Use of this Case shall be shown on the NIS-2 form documenting welding or brazing.