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Docket Nos. 50-321
50-366

HL-5923

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

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program
Submittal of Additional Requests for Relief

Ladies and Gentlemen:

This letter submits Request for Relief Nos. RR-MC-7 and RR-31 for the Third 10-Year Interval Inservice Inspection Program for the Edwin I. Hatch Nuclear Plant. The attached requests for relief propose alternative qualification and certification requirements in accordance with ASME Code Case N-599, and the elimination of VT-1 examination of control rod drive housing bolts, studs, and nuts per the 1996 Addenda to the 1995 Edition of the ASME Section XI Code. Request for Relief Nos. RR-MC-7 and RR-31 are provided in Attachments 1 and 2, respectively.

Should you have any questions in this regard, please contact this office.

Respectfully submitted,


H. L. Sumner, Jr.

IFL/sp

- Attachments: 1. Request for Relief No. RR-MC-7.
2. Request for Relief No. RR-31.

cc: Southern Nuclear Operating Company
Mr. P. H. Wells, Nuclear Plant General Manager
SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. L. N. Olshan, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. J. T. Munday, Senior Resident Inspector - Hatch

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Attachment 1

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program

Request for Relief No. RR-MC-7

SOUTHRN NUCLEAR OPERATING COMPANY
PLANT HATCH, UNITS 1 & 2
THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM
REQUEST FOR RELIEF NO. RR-MC-7

- I. System/Component(s) for Which Relief Is Requested: All Class MC, Paragraph IWA-2310 requirements for qualification of nondestructive examination (NDE) personnel.
- II. Code Requirement: 10 CFR 50.55a(g)(6)(II)(B) requires that containment inspections be conducted in accordance with the 1992 Edition, with 1992 Addenda of ASME Code Section XI. IWA-2310 of the 1992 Edition, 1992 Addenda requires personnel performing NDEs to be qualified and certified in accordance with ANSI/ASNT CP-189.
- III. Requirements of Paragraph IWA-2310, which requires NDE personnel to be qualified and certified using a written practice in accordance with ANSI/ASNT CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel, as amended by the requirements of this division.
- IV. Basis for Relief: 10 CFR 50.55a was amended in the Federal Register to require the use of the 1992 Edition, with the 1992 Addenda of the ASME Code, Section XI when performing containment examinations. In addition to the requirements of IWE/IWL, the requirements of subsection IWA of the 1992 Edition, 1992 Addenda of the ASME Code, Section XI for containment examinations were imposed. IWA-2300 requires qualification of NDE personnel to ANSI/ASNT CP-189.

Currently, the Edwin I. Hatch Nuclear Plant (HNP) Inservice Inspection (ISI) Program requirements for nondestructive testing personnel are written based upon the 1984 Edition of ASNT SNT-TC-1A, as required by the 1989 Edition of the ASME Code, Section XI, which is the HNP code of record. Compliance with the 1992 ASME Code requirements from which relief is requested necessitates establishing a separate and parallel qualification and certification program, and the duplicating a significant portion of existing procedural controls.

Visual examination is the primary nondestructive method required by Subsections IWE and IWL. Neither ANSI/ASNT CP-189 nor ASNT SNT-TC-1A specifically includes visual examination. Therefore, the Code requires qualification and certification to comparable levels as in ANSI/ASNT CP-189 or ASNT SNT-TC-1A, as applicable, and the employer's written practice. The requirements within ANSI/ASNT CP-189 and ASNT SNT-TC-1A for those methods and levels comparable to visual examination are similar. Ultrasonic thickness examinations may also be required by Table IWE-2500-1. Technically, these examinations are relatively simple and do not require an extensive training and qualification program. Therefore, the use of ANSI/ASNT CP-189 in place of ASNT SNT-TC-1A will not significantly improve the capability of NDE to perform the examinations required by IWE. The ASME Section XI Code Committee recognized this fact and on July 30, 1998, approved ASME Code Case N-599, which provides the alternative to use the 1984 Edition of ASNT SNT-TC-1A for the qualification of NDE personnel for ISI of Class MC and Class CC containments in lieu of the requirements of IWA-2310., however, Code Case N-599 has not been incorporated into NRC Regulatory Guide 1.147. A copy of Code Case N-599 is provided for reference in this enclosure.

Basis for Relief (continued):

- V. Alternate Examination: HNP will comply with the requirements of ASME Code Case N-599, which is equivalent to the requirements applicable to ISI Program Class 1, 2, and 3 components.
- VI. Justification for Granting Relief: Implementing and maintaining two separate administrative programs, one for Class 1, 2, and 3 systems and components based upon ASNT SNT-TC-1A, and another solely for Class MC structures, systems, and components based upon ANSI/ASNT CP-189 could result in HNP developing a second written practice, adding difficulty in tracking of certification, and duplicating paperwork. Further, since the HNP ISI Program requirements for qualifying and certifying NDE personnel are based upon the 1984 Edition of ASNT SNT-TC-1A, and, therefore, provide reasonable assurance of qualified examiners for Class 1, 2, and 3 components, the use of these NDE personnel to perform containment examinations will provide an acceptable level of quality and safety. Finally, in recognition of the insignificant gain and the burden the requirement to maintain two separate administrative programs for the qualification and certification of NDE personnel places on the industry, the ASME Section XI Code Committee developed Code Case N-599, which provides an alternative to using the 1984 Edition of ASNT SNT-TC-1A for the qualification of NDE personnel for ISI of Class MC and Class CC containments in lieu of the requirements of IWA-2310. Also, it should be noted that the requirements to comply with IWA-2300 were removed from ASME Code, Section XI, Subsection IWE in the 1998 Edition of the Code. Therefore, Southern Nuclear Operating Company requests that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).
- VII. Implementation Schedule:
- This relief request will be implemented in accordance with the expedited examination schedule for MC components as specified in 10 CFR 50.55a(g)(6)(ii)(B) during the Third 10-Year ISI Interval.
- VIII. Relief Request Status: Submitted to NRC for review and approval.

CASE

N-599

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: July 30, 1998

*See Numeric Index for expiration
and any reaffirmation dates.*

Case N-599

**Alternatives to Qualification of Nondestructive
Examination Personnel for Inservice Inspection of
Metal (Class MC) and Concrete (Class CC)
Containments
Section XI, Division I**

Inquiry: What alternatives may be used, in lieu of the requirements of IWA-2310, for qualification of personnel who perform nondestructive examination of Class MC and Class CC components?

Reply: It is the opinion of the Committee that personnel performing nondestructive examination of Class MC and Class CC components may be qualified and certified using a written practice prepared in accordance with SNT-TC-1A in lieu of the requirements of IWA-2310. Existing certification based on earlier editions of SNT-TC-1A are valid until recertification is required. Recertification shall be in accordance with SNT-TC-1A-1984. Outside agencies, as defined in SNT-TC-1A-1984, may be used to qualify NDE personnel; however, the employer shall be solely responsible for certification of Level I, II, and III personnel.

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Attachment 2

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program

Request for Relief No. RR-31

SOUTHRN NUCLEAR OPERATING COMPANY
PLANT HATCH, UNITS 1 & 2
THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM
REQUEST FOR RELIEF NO. MC-7

- I. System/Component(s) for Which Relief Is Requested: ASME Class 1 control rod drive (CRD) housing bolts, studs, and nuts.
- II. Code Requirement: The 1989 Edition of the ASME Code, Section XI, Table IWB-2500-1, Examination Category B-G-2, Item No. B7.80 requires that CRD housing bolts, studs, and nuts receive a VT-1 examination when disassembled.
- III. Code Requirement from Which Relief Is Requested: Relief is requested from performing a VT-1 examination on ASME Class 1 CRD housing bolts, studs, and nuts when disassembled.
- IV. Basis for Relief: The ASME Code Section XI Committee recognized there is not a significant increase in the level of quality and safety to justify the continuation of VT-1 examinations on CRD housing bolts, studs, and nuts. Therefore, ASME Section XI Code Case N-547 "Alternative Examination Requirements for Pressure Retaining Bolting of Control Rod Drive (CRD) Housings," was developed and approved by the ASME Code Section XI Committee on August 24, 1995. This code case removed the requirement to perform VT-1 examinations on CRD housing bolts, studs, and nuts. Code Case N-547 was incorporated into the 1995 Addenda of the 1995 Edition of ASME Section XI by eliminating ASME Code Item No. B7.80 from Table 2500-1, and thus removing the requirement to perform a VT-1 examination on CRD housing bolts, studs, and nuts. The change is also included in the 1996 Addenda of the 1995 Edition of ASME Code Section XI, which the NRC endorsed in 10CFR50.55a and issued on September 22, 1999. The September 22, 1999, issue of 10 CFR 50.55a did not incorporate any additional examination requirements for the subject components.
- V. Alternate Examination: None.
- VI. Justification for Granting Relief: Since the 1996 Addenda of the 1995 Edition of ASME Code Section XI was endorsed by the NRC in 10 CFR 50.55a and does not contain a requirement to perform a VT-1 examination on CRD housing bolts, studs, and nuts; the elimination of the examinations apparently does not decrease the acceptable level of quality and safety. Therefore, Southern Nuclear Operating Company requests that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).
- VII. Implementation Schedule: This request for relief is applicable to the Third 10-Year ISI Interval, which commenced January 1, 1996.
- VIII. Relief Request Status: Submitted to the NRC for review and approval.