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ROBERT C. MECREDY
Vice President
Nuclear Operations

May 2, 2000

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Guy S. Vissing
Project Directorate I
Washington, D.C. 20555

Subject: Inservice Inspection Program ASME Section XI Required Examinations
Fourth 10-Year Interval
Request for Relief Regarding Request No. 1 (Revision 1)
R.E. Ginna Nuclear Power Plant
Docket No. 50/244

Dear Mr. Vissing:

The purpose of this letter is to seek approval for the use of Relief Request Number 1 to address deferral of Reactor Pressure Vessel (RPV) volumetric examinations to the end of the interval. We are submitting Relief Request Number 1 Revision 1 to replace Revision 0 that you currently have. This revision was made to provide additional clearifications and to incorporate your request on 4/5/2000 for additional information.

This Relief is requested to defer our RPV Shell-to-Flange and Head-to-Flange welds examinations to at or near the end of the interval pursuant to the provisions of 10 CFR 50.55a(a)(3)(ii). Justification concerning RPV examination deferral is included in the attachment to this letter.

We request approval of this relief request by December 31, 2000.

Very truly yours,

Robert C. Mecredy

Attachment
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1000144

A047

xc: Mr. Guy S. Vissing (Mail Stop 8C2)
Project Directorate I-1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
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U.S. NRC Ginna Senior Resident Inspector

RELIEF REQUEST NO. 1 (Revision 1)
(Was previously approved as Relief Request No. 1 for Third Interval)
DEFER RPV EXAMINATIONS TO END OF INTERVAL

I. System/Component for Which Relief is Requested:

Relief is requested for the Reactor Pressure Vessel (RPV) Shell-to-Flange and Head-to-Flange Welds.

II Code Requirement:

ASME Section XI, 1995 Edition 1996 Addenda, Category B-A, Item Numbers B1.30 and B1.40.

III. Code Requirement from Which Relief is Requested:

Table IWB-2500-1, Examination Category B-A, Item Number B1.30, requires that the RPV Shell-to-Flange weld be examined during the first and third periods in conjunction with the nozzle examinations, with at least 50 percent examined during the first period and the remainder by the end of the third period. During these specified periods, the Shell-to-Flange examination can only be accomplished when examined from the flange surface which is not a reliable method. When performing this weld examination from the Vessel inside surface, qualified UT techniques can be utilized to perform a more reliable examination with greater examination coverage as demonstrated during our 1999 10-Year Vessel examination.

Table IWB-2500-1, Examination Category B-A, Item Number B1.40, requires that 1/3 of the RPV Head-to-Flange weld be examined each period. Deferral is not permissible for the Head-to-Flange weld. However, during the first and second periods, the examination need only be performed from the flange face, provided these same portions are examined from the head during the third period.

IV. Basis for Relief:

The Reactor Pressure Vessel is a major source of radiation exposure accumulated during a normal refueling outage Inservice Inspection. By performing the above Category and Item examinations at the end of the interval there will be no sacrifice in the quantity nor quality of examinations but, there will be a substantial reduction in radiation exposure.

V. Alternate Examinations:

R. E. Ginna Nuclear Power Plant proposes that the examinations identified above be performed at or near the end of the interval.

VI. Justification for Granting of Relief:

During the first three inspections intervals, 100 percent of the accessible length of the RPV welds including the Shell-to-Flange weld was examined at or near the end of the interval. The entire examination could be performed from the vessel inside wall from both sides of the weld. This is a more practical approach when performed at the end of the interval using an inside the vessel inspection device.

The Shell-to-Flange weld is examined with the use of an automated system. To perform this examination requires unloading the core, which results in radiation exposure to workers involved in these fuel transfer activities, an increase of contaminated waste and a risk of a fuel handling accident. Greater examination efficiency with an associated decrease in worker radiation exposure would be obtained when performing 100% of the examination at or near the end of the interval instead of doing 50% in the first period and the remainder in the third period. By eliminating duplication of activities such as staging and testing of equipment, moving of shielding, and other support activities including HP coverage, a reduction of radiation exposure can be realized.

The Head-to-Flange weld is performed from the head side of the weld and is examined manually when the head is on a stand. Greater examination efficiency with an associated decrease in worker radiation exposure would be obtained when performing this examination at or near the end of the interval instead of each period.

Performing these examinations once at or near the end of the interval would reduce worker radiation exposure by approximately 1.3 to 1.5 Rem. There are no current industry safety concerns associated with these welds and previous examinations show no active degraded conditions exist. Also, Class 1 Leakage examinations are performed each outage to ensure system/component integrity.

During the fourth interval, 100 percent of the accessible length of all RPV welds including the Shell-to-Flange and Head-to-Flange welds will be performed at or near the end of the interval when all the required examinations can be performed at the same time.

VII. Implementation Schedule:

Implementation shall be performed for the Fourth Interval.