Northern States Power Company

Monticello Nuclear Generating Plant
2807 West County Road 75
Monticello, MN 55362

May 19, 2000

10 CFR Part 50
Section 50.55a

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Request for Relief from Certain ASME Code Requirements for Containment Inspection Examination Plan

10 CFR 50.55a was amended to require the use of the 1992 Edition, 1992 Addenda of ASME Section XI, when performing containment examinations. The effective date for the rule was September 9, 1996. The rule requires implementation of the inservice examinations specified for the first period of the first inspection interval by September 9, 2001. The purpose of this letter is to request review and approval for relief from certain Class MC ISI requirements for the first inspection interval for Monticello's Containment Inspection Examination Plan which will end May 8, 2008.

Attached are Monticello's Relief Requests MC-1 through MC-7 which seek relief from certain requirements of ASME Section XI, 1992 Edition, 1992 Addenda for the first inspection interval for Class MC components. The alternatives maintain the ability of inspections to ensure primary containment boundary integrity.

This submittal is based on similar Davis-Besse Nuclear Power Station submittals dated December 22, 1997, and April 7, 1998, as well as the associated NRC Safety Evaluation of June 30, 1998 (except for relief request MC-7, for which there is no corresponding Davis-Besse submittal). An attachment correlates Davis-Besse Relief Request numbers with Monticello Relief Request numbers.

This letter contains no new Nuclear Regulatory Commission commitments.

Please contact Sam Shirey – Senior Licensing Engineer, at (612) 295-1449 if you require further information.

A047

RGN-001

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Attachments:
Davis-Besse/Monticello Cross Reference Table
ISI Relief Request No. MC-1
ISI Relief Request No. MC-2
ISI Relief Request No. MC-3
ISI Relief Request No. MC-4
ISI Relief Request No. MC-5
ISI Relief Request No. MC-6
ISI Relief Request No. MC-7

Monticello/Davis-Besse Cross Reference Table

Monticello Relief Request No.	Davis-Besse Relief Request No.
MC-1	RR-E2
MC-2	RR-E1
MC-3	RR-E7
MC-4	RR-E3
MC-5	RR-E4
MC-6	RR-E6
MC-7	No corresponding RR for Davis-Besse

NORTHERN STATES POWER CO.
MONTICELLO

CONTAINMENT INSPECTION
EXAMINATION PLAN

ISI Relief Request No. MC-1

All Class MC Components

SYSTEM: Below

Class: MC

Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P

ITEM: All Item Numbers

System/Component(s) For Which Relief Is Requested:

All components subject to examination in accordance with Subsection IWE of the 1992 Edition, 1992 Addenda of ASME Section XI.

Code Requirement:

Subarticle IWA-2300, "Qualification of Nondestructive Examination Personnel," requires qualification of nondestructive examination personnel to CP-189-1991, "Standard for Qualification and Certification of Nondestructive Testing Personnel," as amended by the ASME Section XI.

Code Requirements From Which Relief is Requested:

Relief is requested from the provisions of Subarticle IWA-2300, "Qualification of Nondestructive Examination Personnel." This requires NDE personnel to be qualified and certified using a written practice in accordance with CP-189, "Standard for Qualification and Certification of Nondestructive Testing Personnel," as amended by the requirements of Subarticle IWA-2300.

Basis For Relief:

10 CFR 50.55a was amended to require the use of 1992 Edition, 1992 Addenda of ASME Section XI when performing containment examinations. In addition to the requirements of Subsection IWE, this also imposes the requirements of IWA, General requirements of the 1992 Edition, 1992 Addenda of Section XI. Subarticle IWA-2300 requires qualification of nondestructive examination personnel to CP-189, as amended by Subarticle IWA-2300.

A written practice based on the requirements of CP-189, as amended by the requirements of the Subarticle IWA-2300 to implement Subsection IWE, duplicates efforts already in place for all other subsections. The Monticello Nuclear Generating Plant Third Ten Year Inservice Inspection Program is written to meet the 1986 Edition, No Addenda, of Section XI. Subarticle IWA-2300 of the 1986 Edition requires written practice based on SNT-TC-1A, "Personnel Qualification and Certification in Nondestructive Testing," as amended by the requirements of Subarticle IWA-2300. Further, Subarticle IWA-2300 of the 1992 Edition, 1992 Addenda states "Certifications based on SNT-TC-1A are valid until recertification is required."

Visual inspection is the primary nondestructive examination method required by Subsection IWE. Neither CP-189 nor SNT-TC-1A specifically includes visual examination. Therefore, the Code requires qualification and certification to comparable levels as defined in CP-189 or SNT-TC-1A, as applicable, and the employer's written practice. Ultrasonic thickness examinations may also be required by Table-2500-1. These examinations are relatively simple and do not require an extensive training and qualification program. Therefore, use of CP-189 in place of SNT-TC-1A will not improve the capability of examination personnel to perform visual and ultrasonic thickness examinations required by IWE.

Development and administration of a second program would not enhance safety or quality and would serve as a burden, particularly in developing a second written practice, tracking certifications and duplication of paperwork. This duplication would also apply to vendor nondestructive examination programs. Updating to the 1992 Edition, 1992 Addenda for Subsections IWB, IWC, etc., would require a similar request for relief.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(ii). Compliance with the requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Alternative Examinations:

Examinations required by Subsection IWE shall be conducted by personnel qualified and certified to a written practice based on SNT-TC-1A and to the current Section XI Code of record for IWB, IWC, etc.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.

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CONTAINMENT INSPECTION
EXAMINATION PLAN

ISI Relief Request No. MC-2

Seals and Gaskets

SYSTEM: Below

Class: MC

Category: E-D

Item E5.10 and E5.20

System/Component(s) For Which Relief is Requested:

Seals and gaskets of Class MC pressure retaining components, Examination Category E-D, Items Numbers E5.10 and E5.20 of IWE-2500, "Examination and Pressure Test Requirements," Table IWE-2500-1, ASME Section XI, 1992 Edition, 1992 Addenda.

Code Requirement:

IWE-2500, Table IWE-2500-1 requires seals and gaskets on airlocks, hatches and other devices to be visually examined (VT-3) once each interval to assure containment leak-tight integrity.

Code Requirements From Which Relief is Requested:

Relief is requested from performing the Code-required visual examinations (VT-3) on the above identified metal containment seals and gaskets.

Basis For Relief:

The penetrations discussed below contain seals and gaskets:

Electrical Penetrations

There are three types of electrical penetrations utilized at Monticello. The majority of the electrical penetrations utilize a metal canister which is welded to a containment penetration nozzle. Conductors passing through the canister are sealed with a potting compound to assure leak tight integrity. The canisters are pressurized with dry nitrogen to maintain and monitor integrity and prevent moisture intrusion into the penetration. A second type uses a header plate attached to a containment penetration nozzle flange with redundant metal O-rings between the header plate and flange face. Hermetically glass sealed

electrical modules through which electrical conductors pass are welded to the header plate. The modules are pressurized with dry nitrogen to maintain and monitor integrity and to prevent moisture intrusion into the penetration. A third type utilized on the containment personnel airlock uses a set of compression fittings. The seals and gaskets on these three types of electrical penetrations cannot be inspected without disassembly of the electrical penetration to gain access to the seals and gaskets.

Mechanical Penetrations

Penetrations for the personnel airlock, drywell equipment hatch, torus hatches, drywell head assembly, drywell head access hatch, control rod drive removal hatch, seismic restraint inspection ports, and traversing in-core probe lines utilize gaskets or O-rings to seal the doors, hatches or flanges to ensure leak tight integrity. The personnel air lock also contains other gaskets and seals, such as the handwheel shaft seals, electrical penetrations, and equalizing pressure connections which require disassembly to gain access to the gaskets and seals.

Seals and Gaskets receive a 10 CFR 50 Appendix J, Type B test. As noted in 10 CFR Appendix J, the purpose of Type B tests is to measure leakage of containment penetrations whose design incorporates resilient seals, gasket, sealant compound, and electrical penetrations fitted with flexible metal seal assemblies. Visual examination of seals and gaskets require the joints, which are proven adequate through Appendix J testing, be disassembled. For electrical penetrations, this would involve a pre-maintenance Appendix J test (As Found), determination of cables at the penetrations if enough cable slack is not available, disassembly of the penetration enclosure or joint, removal and/or examination of the seals and gaskets, reassembly of the penetration enclosure or joint, retermination of the cables, post maintenance testing of the cables, and a post maintenance Appendix J test of the penetration (As Left). This imposes the risk that that equipment could be damaged. The work required for mechanical penetrations would be similar except for the determination/retermination and testing of cables.

The 1992 Edition, 1993 Addenda of ASME Section XI IWE 2500-1, Category E-D, Note 1, states that sealed or gasket connections need not be disassembled solely for performance of examinations. However, without disassembly, most of the surface of the seal or gaskets would be inaccessible. The requirement to examine seals and gaskets has been removed in the 1998 Edition of ASME Section XI.

Some penetrations are routinely disassembled during maintenance outages, when necessary, and at each refueling outage. Prior to final closure, the sealing surfaces of these penetrations are inspected for damage which could prevent sealing. The seals and gaskets are inspected and/or replaced as required. This is accomplished by plant procedures or work orders. 10 CFR 50 Appendix J Type B testing is also completed upon final assembly and prior to start-up. Since the Type B test will assure leak tight

integrity of primary containment, the performance of additional visual inspections would not increase the level of safety or quality.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). Testing the seal and gaskets in accordance with 10 CFR 50 Appendix J provides adequate assurance of the leak-tight integrity of the seal and gaskets and provides an acceptable level of quality and safety.

Alternate Examination:

The leak-tightness of seals and gaskets will be tested in accordance with 10 CFR 50 Appendix J. This testing is performed at least once each inspection interval.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.

ISI relief Request MC-3
Class MC Pressure Retaining Bolting

STSTEM: Below
Category: E-G

Class: MC
Item: E8.20

Systems/Components For Which Relief Is Requested:

Class MC Pressure Retaining Bolting

Code Requirement(s):

ASME Section XI, 1992 Edition, 1992 Addenda, Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item E8.20.

Code Requirement From Which Relief Is Requested:

Relief is requested from ASME Section XI 1992 Edition, 1992 Addenda, Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item E8.20. Table IWE-2500-1 requires a bolt torque or tension test on bolted connections that have not been disassembled and reassembled during the inspection interval.

Basis For Relief:

Bolt torque and tension testing is required on bolted connections that have not been disassembled and reassembled during the inspection interval. Determination of the torque or tension value would require the bolting be un-torqued and re-torqued or re-tensioned. Monticello has 29 bolted penetrations of which 17 are pressure seating and 12 are pressure unseating. Of the pressure unseating penetrations, four are routinely disassembled within the period. The remaining eight pressure unseating penetrations consist of two electrical penetrations, five mechanical penetrations on the TIP System, and the drywell head access hatch.

Each containment penetration receives a 10 CFR 50 Appendix J, Type B test in accordance with the specified frequencies. As noted in 10 CFR 50 Appendix J, the purpose of Type B tests is to measure leakage of containment penetrations whose design incorporates resilient seals, gaskets, sealant compounds, and electrical penetrations fitted with flexible metal seal assemblies. For pressure seating penetrations, the performance of the Type B test itself proves that the bolt torque or

tension remains adequate to provide a leak rate that is within acceptable limits. The torque or tension value of bolting only becomes an issue if the leak rate is excessive. For pressure unseating penetrations, the performance of the Type B test may not prove that the bolt torque or tension remains adequate. Inspection of pressure unseating penetrations during a 10 CFR 50 Appendix J Type A test would prove that the bolt torque or tension remains adequate to provide a leak tight penetration.

Once a bolt is torqued or tensioned on a containment penetration, it is not subject to dynamic loading that could cause it to experience significant changes; therefore re-torquing is unnecessary. Leak rate testing per Appendix J and visual inspection is adequate to demonstrate that the design function is met. Torque or tension testing is not required for any other ASME, Class 1, 2, or 3 bolted connections or their supports as part of the inservice inspection program.

The requirements to perform bolt torque or tension tests has been removed in the 1997 Addenda of ASME Section XI. This addenda has been approved by the Main Committee and was issued in the 1998 Edition of ASME Section XI.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(ii). Un-torquing and subsequent re-torquing of bolted connections, which are verified not to experience unacceptable leakage through 10 CFR 50 Appendix J, Type A testing for pressure unseating penetrations and Type B testing for pressure seating penetrations, results in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Alternative Examination(s):

The following examinations and tests required by Subsection IWE ensure the structural integrity and the leak-tightness of Class MC pressure retaining bolting:

1. Exposed surfaces of bolted connections shall be visually examined in accordance with requirements of Table IWE-2500-1, Category E-G, Pressure Retaining Bolting, Item No. E8.10, and

2. Bolted connections shall meet the pressure test requirements of Table IWE-2500-1, Category E-P, All Pressure Retaining Components, Items E9.30 and E9.40.

Additionally, inspections for excessive leakage of pressure unseating penetrations will be performed during 10 CFR 50 Appendix J, Type A testing.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.

ISI Relief Request MC-4
All Class MC

SYSTEM: Below
Category: N/A

Class: MC
Item: N/A

Systems/Component(S) For Which Relief Is Requested:

All Class MC, Subarticle IWE-2200(g) preservice examination requirements of reapplied painted or coated containments.

Code Requirement(s):

ASME Section XI, 1992 Edition, 1992 Addenda, Subsection IWE-2200(g) requires that when paint or coatings are reapplied, the condition of the new paint or coating shall be documented in the preservice inspection.

Code Requirement From Which Relief Is Requested:

Relief is requested from the requirement to perform a preservice inspection of new paint or coatings.

Basis For Relief:

Paint and coatings are not part of the containment pressure boundary under current Code rules as they are not associated with the pressure containing function of the component (Paragraph NE-2110(b)(5) of ASME Section III). Paint and coatings on the containment pressure boundary were not subject to Code rules when they were originally applied and are not subject to ASME Section XI rules for repair and replacement in accordance with IWA-4111(b)(5). The requirement to perform a preservice inspection when paint or coatings are reapplied was removed in ASME Section XI, 1998 Edition, Subsection IWE. However, degradation of the coating could impact the structural integrity of the containment. The adequacy of coatings is verified following application through inspections performed by the Monticello Nuclear Generating Plant (MNGP) coatings maintenance program.

Recording the condition of reapplied coatings in preservice records does not substantiate containment structural integrity. Should deterioration of coating in the reapplied area occur, the area will require additional evaluation regardless of the

preservice record. Although MNGP has been performing preservice inspections of reapplied coatings as required by IWE, recording condition of the new paint or coatings in the preservice records does not increase the level of quality and safety of containment.

In SECY 96-80 "Issuance of Final Amendment to 10 CFR Section 50.55a to Incorporate by Reference the ASME Boiler and Pressure Vessel Code (ASME Code), Section XI, Division 1, Subsection IWE and Subsection IWL," dated April 17,1996, response to Comment 3.2 about IWE-2200(g) states, "In the NRC's opinion, this does not mean that a visual examination must be performed with every application of paint or coating. A visual examination of the topcoat to determine the soundness and the condition of the topcoat should be sufficient." This process is accomplished through inspections performed by the MNGP coating maintenance program. The MNGP coating maintenance programs is described in a November 11, 1998, response to Generic Letter 98-04. In this program the condition of the coatings are examined every 18 months for torus interior, waterline and above, along with the vent system and drywell interior. The exterior of the torus is inspected every five years. The torus is drained every five years and the area below the waterline is inspected at that time. General visual examinations required by IWE are performed each period. These periodic examinations will identify evidence of flaking, blistering, peeling, discoloration, or other signs of coating distress indicative of degradation of the coating system.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). The MNGP nuclear coating program currently provides an adequate level of quality and safety.

The requirement to perform a preservice examination when paint or coatings are reapplied has been removed from the 1998 Edition of ASME Section XI.

Alternative Examinations:

Reapplication of paint and coatings on the drywell, vent system and the suppression chamber will be examined in accordance with the MNGP coating maintenance program. Although repairs to paint or coatings are not subject to the repair/replacement rules of ASME Section XI (Inquiry 97-22), repairs to the primary containment boundary, if required, would be conducted in accordance with ASME Section XI Code rules.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.

ISI Relief Request MC-5
All Class MC

SYSTEM: Below
Category: N/A

Class: MC
Item: N/A

Systems/Component(S) For Which Relief Is Requested:

All Class MC, Subarticle IWE-2500(b) visual examinations per Table IWE-2500-1 of painted or coated containment components prior to removal of paint or coatings.

Code Requirement(s):

ASME Section XI, 1992 Edition, 1992 Addenda, Subsection IWE-2500(b) requires that when paint or coatings are to be removed, the paint or coating shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

Code Requirement From Which Relief Is Requested:

Subarticle IWE-2500(b) requires that when paint or coatings are to be removed, the paint or coatings shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

Basis For Relief:

Paint and coatings are not part of the containment pressure boundary under current Code rules as they are not associated with the pressure containing function of the component (Paragraph NE-2110(b)(5) of ASME Section III). Paint and coatings on the containment pressure boundary were not subject to Code rules when they were originally applied and are not subject to ASME Section XI rules for repair and replacement in accordance with IWA-4111(b)(5). The requirement to perform a visual examination prior to removal of paint or coatings was removed in ASME Section XI, 1998 Edition, Subsection IWE. NSP's experience with performing inspections prior to removal of coatings as required by IWE indicates there is a burden without a compensating increase in quality or safety.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). The MNGP coating maintenance program currently provides an adequate level of quality and safety.

Alternative Examinations:

The condition of prepared surfaces are inspected prior to application of new paint or coatings as required by the MNGP coating maintenance program. If degradation is identified, additional measures are taken to determine if the containment pressure boundary is affected. Repairs to the primary containment boundary, if required, will be conducted in accordance with ASME Section XI Code rules.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.

ISI Relief Request MC-6
All Class MC

System: Below

Class: MC

Category: All Category Numbers

Item: All Item Numbers

System/Component (s) For Which Relief Is Requested:

All Class MC, Paragraphs IWE-2420(b) and IWE-2420(c) successive examination requirements for components found acceptable for continued service.

Code Requirements:

Paragraphs IWE-2420(b) and IWE-2420(c) of the 1992 Edition, 1992 Addenda of ASME Section XI, requires that when component examination results require evaluation of flaws, evaluation of areas of degradation, or repairs in accordance with Article IWE-3000, "Acceptance Standards," and the component is found to be acceptable for continued service, the areas containing such flaws, degradation, or repairs shall be reexamined during the next inspection period listed in the schedule of the inspection program of Paragraph IWE-2411, "Inspection Program A," or Paragraph IWE-2412, "Inspection Program B," in accordance with Table IWE 2500-1, Examination Category E-C.

Code Requirement From Which Relief Is Requested:

Relief is requested from the requirement of Paragraphs IWE-2420(b) and IWE-2420(c) to perform successive examination of repairs.

Basis For Relief:

The purpose of a repair is to restore the component to an acceptable condition for continued service in accordance with the acceptance standards of Article IWE-3000. Paragraph IWA-4150, "Verification of Acceptability," requires the owner to conduct an evaluation of the suitability of the repair including consideration of the cause of failure.

If the repair has restored the component to an acceptable condition, successive examinations are not warranted. If the repair was not suitable, then the repair does not meet Code requirements and the component is not acceptable for continued service.

Neither Paragraph IWB-2420(b), Paragraph IWC-2420(b), nor Paragraph IWD-2420(b) requires a repair to be subjected to successive examination requirements. Furthermore, if the repair area is subject to accelerated degradation, it would still require augmented examination in accordance with Table IWE-2500-1, Category E-C.

Successive examinations of repair in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) constitute a burden without a compensating increase in quality or safety.

In SECY 96-080, "Issuance of Final Amendment to 10 CFR Section 50.55a to Incorporate by Reference the ASME Boiler and Pressure Vessel Code (ASME Code), Section XI, Division 1, Subsection IWE and Subsection IWL," dated April 17, 1996, response to comment #3.3 states, "The purpose of IWE-2420(b) is to manage components found to be acceptable for continued service (meaning no repair or replacement at this time) as an Examination Category E-C component... If the component had been repaired or replaced, then the more frequent examination would not be needed."

The requirement for successive examinations following repairs has been removed in the rewrite of Subsection IWE of Section XI, 1998 Edition.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(ii). Compliance with the specified requirements of this section for repairs would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

Alternate Examinations:

Successive examinations in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) are required except for repairs.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.

NORTHERN STATES POWER CO.
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CONTAINMENT INSPECTION
EXAMINATION PLAN

ISI Relief Request No. MC-7
Containment Surfaces

System: Below

Class: MC

Category: E-A

Item: E1.12, E1.20

System/Component(s) For Which Relief Is Requested:

Accessible surface areas of Class MC pressure retaining components, Examination Category E-A, Items Numbers E1.12 and E1.20 of IWE-2500, "Examination and Pressure Test Requirements," Table IWE-2500-1, ASME Section XI, 1992 Edition, 1992 Addenda.

Code Requirement(s):

ASME Section XI, 1992 Edition with the 1992 Addenda, Table IWE-2500-1, Examination Category E-A, Containment Surfaces, Item E1.12 and Item E1.20, requires accessible surface areas of the containment vessel and the vent system to be visually examined (VT-3) once at the end of each interval to assure containment leak-tight integrity.

Code Requirements From Which Relief Is Requested:

Relief is requested from ASME Section XI, 1992 Edition with the 1992 Addenda, Table IWE-2500-1, Examination Category E-A, Containment Surfaces, Item E1.12 and item E1.20. Table IWE-2500-1 requires all accessible surface areas of the metal containment and the vent system to be visually examined (VT-3) at the end of interval.

Basis For Relief:

Visual examination of 100% of the accessible surfaces of the metal containment and the vent system would be required at the end of the interval. Code Case N-601 "Extent and Frequency of VT-3 Visual Examination for Inservice Inspection of Metal Containments, Section XI, Division 1" provides an alternative to the Code Requirements of performing 100% of Items E1.12 and E1.20 at the end of the interval. The code case states "The VT-3 examinations in Table IWE-2500-1, Examination Category E-A, Containment

Surfaces, may be performed at any time during the interval, provided the requirements for successive inspections in IWE-2420 are met."

NRC Information Notice No. 88-82: Torus Shells With Corrosion and Degraded Coatings in BWR Containments, dated Oct. 14, 1988, states that localized degradation such as pitting can be detected most effectively by draining the torus and inspecting it under dry conditions. Monticello Nuclear Generating Plant (MNGP) is scheduled to drain the torus every third refueling outage or approximately every 5 years for coating inspection, with the next scheduled drain down in the 2003 refueling outage. Inspection and repairs to the vent system coatings would be also done during the torus drain downs. This would be the best opportunity to visually inspect 100% of the internal torus and the vent system to meet Items E1.12 and 1.20. The successive inspection requirements of IWE-2420 will be maintained with the existing schedule.

Pursuant to 10CFR50.55a(a)(3)(ii), relief is requested on the basis that the required examination would result in hardship without a compensating increase in the level of quality and safety. Draining the torus at the end of the inspection interval as required by Table IWE-2500-1 constitutes hardship as it would require an additional draining of the torus expressly for this inspection.

Alternative Examination(s):

The VT-3 visual examinations of the accessible surface areas of the containment vessel pressure retaining boundary and vent system will be performed in accordance with Code Case N-601. This code case provides an alternative in that the visual examinations may be performed at any time during the interval, provided the requirements for successive inspections in IWE-2420 are met.

Applicable Time Period:

Relief is requested for the first inspection interval of the Containment Inspection Examination Plan for Monticello Nuclear Generating Plant.