

Niagara Mohawk

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May 30, 2000
NMPIL 1518

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

RE: Nine Mile Point Unit 1
 Docket No. 50-220
 DPR-63

 Nine Mile Point Unit 2
 Docket No. 50-410
 NPF-69

Subject: *Use of 1998 Edition of ASME Code Section XI for Containment Inspections
(TAC Nos. MA7116, MA7117, and MA7118)*

Gentlemen:

By letter dated October 28, 1999, as supplemented by letters dated January 13, 2000, and April 7, 2000, Niagara Mohawk Power Corporation (NMPC) requested authorization to use the 1998 Edition of the ASME Boiler and Pressure Vessel Code for Nine Mile Point Unit 1 and Unit 2 expedited containment inspections. The NRC staff and its contractor, INEEL, reviewed the April 7, 2000, submittal and provided comments regarding NMPC's response to question 4. The NRC/INEEL comments were documented in a memorandum from Peter S. Tam to Marsha Gamberoni, dated May 2, 2000, and were discussed between NMPC and the NRC staff in a telephone conference on May 15, 2000. The Attachment to this letter provides NMPC's formal response to the staff's comments, in accordance with the telephone discussion held on May 15, 2000.

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/IAA/tmk
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
 Ms. M. K. Gamberoni, Acting Section Chief PD-1, Section 1, NRR
 Mr. G. K. Hunegs, NRC Senior Resident Inspector
 Mr. P. S. Tam, Senior Project Manager, NRR
 Records Management

ATTACHMENT
Responses to NRC Comments

Item 1

NRC Comment:

NMPC's proposed alternative does not address the procedures to be followed when suspect areas of degradation or damage are found during the General Visual examination.

NMPC Response:

NMPC will follow the requirements of the ASME Boiler and Pressure Vessel Code, Section XI for the examination, evaluation, disposition and corrective actions relating to bolted connections. Summarized below are the steps required by ASME Section XI that NMPC has incorporated in its containment inspection programs for Nine Mile Point Units 1 and 2.

Step 1: All accessible Bolted connections shall be examined once each inspection period, by the General Visual Examination (equivalent to a VT-3 examination) Method, (IWE-2310(b)), in accordance with Table IWE-2500-1, Examination Category E-A, of the 1998 Edition of Section XI. The General Visual examination of all accessible bolted connections is performed three (3) times per inspection interval.

Note: Bolted connections scheduled for General visual examination within each inspection period may be examined either in place under tension, when the bolted connection is disassembled, or when the bolting is removed.

Step 2: If the results of the General Visual examination (IWE-2310(b)), identify possible areas of degradation or damage, a Detailed Visual examination (IWE-2310(c), equivalent to a VT-1 examination), shall be performed on the area of degradation or damage to determine the extent of the degradation or damage.

Step 3: The results of the General Visual examination (IWE-2310(b)) and/or Detailed Visual examination (IWE-2310(c)) shall be compared against the acceptance standards of IWE-3500 and/or NMPC's defined acceptance criteria, by a certified Visual NDE Level II or III. In accordance with IWE-3122.1, a component whose examination results meet the acceptance standards of IWE-3500 and/or NMPC's acceptance criteria shall be acceptable for continued service.

Step 4: As required by IWE-3122.1, in the case of a component whose General Visual examination and/or Detailed Visual examination results exceed the acceptance standards of IWE-3500 and/or NMPC's defined acceptance criteria, as determined by a certified Visual NDE Level II or III, the results of the examination (s) shall be submitted to the IWE Responsible Engineer (IWE-2320) for an Engineering Evaluation in accordance with IWE-3122.3.

Step 5: As required by IWE-3122.1, a component whose results exceed the acceptance standards of IWE-3500 and/or NMPC's defined acceptance criteria may be determined by an Engineering Evaluation (IWE-3122.3) to be acceptable for continued service without repair/replacement in accordance with IWE-3122.2.

Note: Disassembly of bolted connections shall be conducted as required by the IWE Responsible Engineer to support the Engineering Evaluation.

Step 6: As required by IWE-3122.1, a component whose examination results exceed the acceptance standards of IWE-3500 and/or NMPC's defined acceptance criteria, and have been determined by an Engineering Evaluation (IWE-3122.3) to be unacceptable for continued service, shall be repaired/replaced in accordance with IWE-3122.2.

Note: Disassembly of bolted connections shall be as required by the IWE Responsible Engineer's Evaluation.

Step 7: As required by IWE-3124, Repairs/Replacements shall comply with the requirements of IWA-4000.

Step 8: Reexamination following repair/replacement shall be in accordance with IWE-2310 (b) and/or (c), as applicable.

Item 2

NRC Comment:

If a disassembled (bolted) connection is not visually examined by a VT-3 (General Visual) or VT-1 (Detailed Visual) qualified individual before reassembly, written maintenance procedures shall be followed to ensure that the integrity of the reassembled bolted connection is maintained. The written procedures shall include acceptance criteria for the continued use of all parts of the connection, including bolts, studs, nuts, bushings, washers, and threads in base material and flange ligaments between fastener holes. Discuss how NMPC will comply.

NMPC Response:

In NMPC's opinion, the General Visual examination requirements of the 1998 Edition of Section XI are more restrictive than the NRC endorsed 1992 Edition, in that the 1998 Edition requires a General Visual examination in each period, whereas the 1992 Edition requires a VT-1 examination once per ten-year inspection interval.

Assembled and/or Disassembled Bolted connections that are scheduled for ASME Section XI (General and/or Detailed) visual examination follow the steps identified in NMPC's response to comment 1.

For the purposes of this comment, examinations of bolted connections outside of scheduled ASME Section XI examinations are classified by NMPC as maintenance.

Maintenance is defined as (a) activities requiring subsequent Section XI tests or examinations, or (b) activities for which Section XI is not applicable. Explained below are the differences as they relate to bolted connections:

1. Maintenance at other than a scheduled period Section XI examination, which does not require a design change, installation of a pressure retaining item, or welding on the pressure retaining bolted connection is considered maintenance. However, because the integrity of the bolted connection may be in question due to the disassembly/reassembly, testing is required in accordance with the Appendix J Program prior to continued service. Additionally, maintenance of bolted connections is performed in accordance with documented Work Plans, which are part of the controlling Work Order. Work Plans contain information for inspection of fastener condition, flange condition, gasket type, and torque values. Work Plans contain Quality Control and ANII hold points, as applicable. The individuals performing and inspecting work sign the Work Plans.
2. Maintenance at other than a scheduled period Section XI examination, which will require repairs and/or replacement of a pressure retaining item, or welding on the pressure retaining bolted connection are also considered by NMPC to be maintenance. However, because the repair/replacement is conducted on a Class MC component, the ASME Section XI Repair/Replacement Program is automatically invoked, which will require a preservice (baseline) examination. Also, because the integrity of the bolted connection is in question, testing will be required in accordance with the Appendix J Program.