



**Florida
Power**

CORPORATION
Crystal River Unit 3
Docket No. 50-302
Operating License No. DPR-72

July 17, 2000
3F0700-03

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Subject: Relief Request 00-001-II, Revision 1 (TAC No. MA9187)

Reference: FPC to NRC Letter, 3F0600-06, dated June 1, 2000, "Third Ten Year Interval, Inservice Inspection Program, Relief Request 00-001-II"

Dear Sir:

Florida Power Corporation (FPC) requested authorization to implement Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel," in the referenced letter. During review of the relief request, the NRC staff determined two additional conditions are necessary to assure the use of Code Case N-546 provides an acceptable level of quality and safety. The two conditions were communicated to FPC by the NRC Project Manager on June 19, 2000. FPC is providing, in Attachment A, a revision to Relief Request 00-001-II which incorporates the two conditions.

If you have any questions regarding this submittal, please contact Mr. Sid Powell, Manager, Nuclear Licensing at (352) 563-4883.

Sincerely,

Thomas H. Taylor
Director, Nuclear Engineering & Projects

THT/lvc

Attachments

xc: Regional Administrator, Region II
Senior Resident Inspector
NRR Project Manager

A047

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT A

THIRD TEN YEAR INTERVAL

INSERVICE INSPECTION PROGRAM

RELIEF REQUEST 00-001-II, REVISION 1

**THIRD TEN YEAR INTERVAL
RELIEF REQUEST 00-001-II, REVISION 1**

I. REFERENCE CODE: American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 1989 Edition with no Addenda.

II. COMPONENTS FOR WHICH RELIEF IS REQUESTED:

ASME Class 1, 2, 3, and MC pressure piping and components categories B-E, Pressure Retaining Partial Penetration Welds in Vessels; B-P, All Pressure Retaining Components; C-H, All Pressure Retaining Components; D-A, Systems in Support of Reactor Shutdown Function; D-B, Systems in Support of Emergency Core Cooling, Containment Heat Removal, Atmosphere Cleanup, and Reactor Residual Heat Removal; D-C, Systems in Support of Residual Heat Removal from Spent Fuel Storage Pool; and E-P, All Pressure Retaining Components.

III. CURRENT CODE REQUIREMENTS AND REQUEST FOR RELIEF:

Pursuant to 10 CFR 50.55a(a)(3)(i), Florida Power Corporation (FPC) is requesting relief from the requirements of the ASME Code, Section XI, Subarticle IWA-2312, 1989 Edition with no Addenda as stated below:

“Personnel performing visual examinations or using other NDE methods not addressed in SNT-TC-1A shall be qualified and certified to comparable levels of qualification as defined in SNT-TC-1A and the Employer's written practice.”

As an alternative, FPC proposes to use the alternate requirements in Code Case N-546 which provides an acceptable level of quality and safety.

IV. ALTERNATE EXAMINATION:

Crystal River Unit 3 (CR-3) will implement a training program that satisfies the requirements of ASME Section XI Code Case N-546, “Alternative Requirements for Qualification of VT-2 Examination Personnel.” Personnel that are qualified and certified in accordance with ASME Section XI, IWA-2300 requirements may be utilized to perform VT-2 leakage examinations. Personnel that meet the requirements of the Owner's training requirements, in accordance with Code Case N-546, will also be considered qualified to perform VT-2 examinations. The Code Case provides the following requirements for qualification of VT-2 personnel:

- (a) At least 40 hours plant walk-down experience, such as that gained by licensed and nonlicensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel.
- (b) At least 4 hours of training on Section XI requirements and plant specific procedures for VT-2 visual examination.
- (c) Vision test requirements of IWA-2321, 1995 Edition.

Training and qualification of VT-2 personnel will be documented and the records of the personnel qualified to perform VT-2 examinations will be maintained for the life of the plant. To provide for consistent quality of VT-2 examinations, the examinations will be performed using standard plant specific procedures. An independent review and evaluation of VT-2 visual examination results will be performed and documented on the examination records after completion. Additionally, FPC will:

- Qualify VT-2 examination personnel by examination to demonstrate knowledge of Section XI and plant specific procedures for VT-2 visual examination.
- Re-qualify examination personnel in accordance with the frequency specified in IWA-2314 of the ASME Code, Section XI, 1995 Edition.

V. BASIS FOR REQUESTING RELIEF:

Code Case N-546 was published in Supplement 2 of the ASME Code, Section XI, 1995 Edition. The Code Case provides alternative requirements to those of IWA-2300 for the qualification of VT-2 examination personnel. The ASME Section XI Code Committee determined that such training in accordance with this Code Case would ensure that an adequate level of quality and safety was being maintained. VT-2 examination requires no special knowledge of technical principles underlying its performance. It is simply the straight forward examination for leakage. No special skill or technical training are required in order to observe water dripping from a component or bubbles forming on a joint wetted with leak detection solution. As such, qualification in accordance with the provisions of the Code Case does not present any reduction in quality or safety.

Code Case N-546 allows personnel most familiar with the walkdown of plant systems such as licensed and non-licensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel to perform VT-2 examinations without formal qualification and certification. These personnel typically have a sound working knowledge of plant components and piping layouts which makes them acceptable candidates for performing VT-2 visual examinations.

When performing a system pressure test in accordance with ASME Section XI, Operations personnel walkdown the systems to meet the Improved Technical

Specifications (ITS) requirements, and VT-2 examiners walkdown the systems to meet the ASME Section XI requirements. The use of Code Case N-546 will allow the qualification of Operations personnel to perform VT-2 examinations. This will enable the operators to perform walkdowns which fulfill the requirements of both ASME Section XI and ITS. This will result in a savings of manpower and radiation exposure at CR-3.

As previously stated, this request is in accordance with 10 CFR 50.55a(a)(3)(i), as compliance with Code Case N-546 will provide an essentially equivalent alternative to the IWA-2300 requirements. Approval of this request would provide relief from the administrative and financial burden of certification without decreasing the level of quality or safety.

VI. IMPLEMENTATION SCHEDULE:

Crystal River Unit 3 is in the Third Ten Year Inservice Inspection (ISI) Interval. FPC intends to implement Code Case N-546 during this interval prior to the next refueling outage scheduled for fall 2001.

FLORIDA POWER CORPORATION
CRYSTAL RIVER UNIT 3
DOCKET NUMBER 50-302/LICENSE NUMBER DPR-72

ATTACHMENT B

THIRD TEN YEAR INTERVAL
INSERVICE INSPECTION PROGRAM
RELIEF REQUEST 00-001-II REVISION 1

LIST OF REGULATORY COMMITMENTS

The following are the actions committed to by Florida Power Corporation in this document. Any other actions discussed in the submittal represents intended or planned actions by Florida Power Corporation. They are described to the NRC for the NRC's information and are not regulatory commitments. Please notify the Manager, Nuclear Licensing of any questions regarding this document or any associated regulatory commitments.

Letter Number	Commitment	Commitment Date
3F0700-03	<ul style="list-style-type: none"> ▪ Training and qualification of VT-2 personnel will be documented and the records of the personnel qualified to perform VT-2 examinations will be maintained for the life of the plant. ▪ To provide for consistent quality of VT-2 examinations, the examinations will be performed using standard plant specific procedures. ▪ An independent review and evaluation of VT-2 visual examination results will be performed and documented on the examination records after completion. ▪ FPC will qualify VT-2 personnel by examination to demonstrate knowledge of Section XI and plant specific procedures for VT-2 visual examination. ▪ FPC will re-qualify examination personnel in accordance with the frequency specified in IWA-2314 of the ASME Code, Section XI, 1995 Edition. 	Programmatic commitment to be implemented upon approval of Relief Request 00-001-II