

August 11, 2000

Mr. Oliver D. Kingsley, President
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Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING REQUESTS FOR RELIEF TO USE THE 1998 EDITION OF SUBSECTIONS IWE AND IWL OF THE ASME CODE; BYRON STATION, UNITS 1 AND 2, DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3, AND LASALLE COUNTY STATION, UNITS 1 AND 2 (TAC NOS. MA8933, MA8934, MA8935, MA8936, MA8937, AND MA8938)

Dear Mr. Kingsley:

By letter dated May 8, 2000, Commonwealth Edison Company requested inservice inspection requests for relief to implement Subsections IWE and IWL of Section XI (1998 Edition) of the American Society of Mechanical Engineers Boiler & Pressure Vessel Code in their entirety and include supplemental proposed alternatives.

During our review of the request, we have determined that additional information is required. Enclosed is our Request for Additional Information (RAI). It has been discussed with members of your staff during telephone calls on August 8 and August 10, 2000.

A prompt response to the RAI will help us to provide an expeditious review of the relief requests.

Sincerely,

/RA/

George F. Dick, Jr., Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455,
50-237, 50-249, 50-373,
and 50-374

Enclosure: Request for Additional
Information

cc w/encl: See next page

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Dear Mr. Kingsley:

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Docket Nos. STN 50-454, STN 50-455,
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and 50-374

Enclosure: Request for Additional
Information

cc w/encl: See next page
ACCESSION NO.: ML003740855

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Request for Additional Information

Relief Requests to Use of 1998 Edition of Subsections IWE and IWL of ASME Code

Byron Station, Units 1 and 2

Dresden Nuclear Power Station, Units 2 and 3

LaSalle County Station, Units 1 and 2

Docket Nos. STN 50-454, STN 50-455, 50-237, 50-374, 50-373, and 50-374

During review of Commonwealth Edison Company's submittal of May 8, 2000, the staff has determined that it needs additional information in order to complete the review. The following additional information and confirmations are requested in order to permit the staff to complete its evaluation of the subject requests for relief.

1. **Request for Relief I2R-38, I2R-39, MCR-02, CR-33, CR-34,** - The 1998 Code Edition, Articles IWE and IWL, defer to *owner-defined* General and Detailed visual examinations in lieu of accepted visual examination requirements, as currently described in IWA-2000. To establish that the licensee's alternative provides an acceptable level of quality and safety, details of Commonwealth Edison Company's General and Detailed Visual Examination Program, addressing both IWE and IWL components, must be evaluated. Please describe the following attributes of the visual examination program:
 - a) The owner-defined acceptance criteria that will be used with the General and Detailed visual examination for both IWE and IWL components.
 - b) The 1992 Edition/1992 Addenda, paragraph IWA-2310, requires that personnel performing NDE shall be qualified and certified using a written practice prepared in accordance with ANSI/ASNT CP-189. The 1998 Edition contains a new paragraph IWE-2330 relating to personnel qualification. This paragraph states that the owner is responsible for defining the qualification requirements for personnel performing visual examinations. The staff has determined that the 1998 Code requirement requires licensee augmentation.

The licensee states that personnel performing containment visual examinations will be qualified to a program developed using ANSI/ASNT CP-189 as *guidance*. Based upon the licensee's statement, it is unclear whether inspection personnel will be adequately qualified and certified. State whether the visual qualification and certification requirements specified in ANSI/ASNT CP-189 will be fully implemented for containment visual examination personnel. If not, provide information detailing the alternative qualification and certification processes that will be used.

- c) The IWE-2500(b) requirement to examine paint or coatings prior to removal has been eliminated from the 1998 Edition. Relief from this requirement has been found acceptable when adequate provisions exist either in the licensee's Containment Inspection, Repair/Replacement, Nuclear Coatings, or Inservice Inspection Programs. However, the staff requires that exposed base metal be inspected to verify the structural integrity and leak worthiness prior to re-application of any coatings.

It is understood the licensee will use a coatings pre-application inspection that will be performed by qualified/certified personnel, as applicable. The staff concludes that this is an adequate alternative to the requirements of IWE-2500(b) provided that, as a minimum, 90% of the nominal base metal thickness is maintained prior to re-application of coatings. Confirm that greater than or equal to 90% of the original nominal base metal thickness will be verified prior to re-application of coatings.

- 2. **Requests for Relief I2R-38, MCR-02, and CR-33** - Examination Category E-G, Pressure Retaining Bolting, has been removed from Table IWE-2500-1 in the 1998 Edition. The 1992 Edition requires a visual examination (VT-1) of bolting when a connection is disassembled. The 1998 Edition requires a General visual, performed in place, with no requirement for visual examination when the joint is disassembled.

- a) In order to provide an acceptable level of quality and safety the staff has determined that the 1998 Edition requirements for visual examination of bolted connections must be supplemented. In this regard, the staff has established the following technical consensus.

"All accessible bolted connections shall be visually examined each inspection period per the requirements of the 1998 Edition of ASME Section XI, Table IWE-2500-1, Category E-A. This corresponds to an examination of all bolted connections three times per inspection interval. The licensee shall perform a general visual examination (VT-3 or equivalent) on the exposed portions of the connection. Bolted connections need not be disassembled solely for the performance of VT-3 examinations. However, if the general visual examination indicates possible areas of degradation or damage, a detailed visual examination (VT-1 or equivalent) shall be performed.

"If a bolted connection is disassembled at the time of periodic inspection, all accessible surface areas of the connection shall be visually examined [general (VT-3), or detailed (VT-1), if necessary]. If a connection is disassembled at times other than periodic (or planned) inspection and is not examined by a qualified visual examiner before reassembly, written maintenance procedures shall be followed to ensure that the integrity of reassembled bolted connections are maintained. The written procedures shall include acceptance criteria for the continued use

of all parts of the connection including bolts, studs, nuts, bushings, washers, threads in base material and flange ligaments between fastener holes.”

Please confirm that the supplemental conditions listed above will be met.

- b) The 1992 Edition/Addenda requires the measurement of bolt torque or tension for bolted connections that have not been disassembled during the interval. This requirement has been eliminated in the 1998 Edition. The staff has concluded that Appendix J testing may be used to verify the leak-tight integrity of bolted connections, seals and gaskets at containment penetrations, provided these tests (Appendix J, Types B or C) are applied appropriately. Provide a brief summary of the Appendix J program at each facility, including which Option is being used, and the rationale for when these tests would be applied in lieu of bolt torque or tension testing to include disassembly or repair/replacement of bolting at times other than periodic (or planned) inspection.
3. **Request for Relief I2R-39, CR-34, - IWL-2410**, allows for deferral of concrete visual exams to the next scheduled plant outage for portions of the concrete surface that cannot be examined within the stated time interval. This may be considered acceptable provided credit for the examination is not taken for two intervals simultaneously. Please confirm that this condition will be met.