



**Florida  
Power**

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

August 24, 2000  
3F0800-12

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

Subject: Third Ten Year Interval  
Inservice Inspection Program  
Relief Request 00-002-II

Dear Sir:

Pursuant to 10 CFR 50.55a(a)(3)(i), Florida Power Corporation (FPC) is requesting relief from the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI of the 1989 Edition with no Addenda. Relief Request 00-002-II seeks authorization to use the requirements of 10 CFR 50.55a(b)(2)(xiv) in lieu of the provisions of the 1989 Edition of ASME Section XI, Appendix VII, Paragraph VII-4240, Annual Training.

Currently, Crystal River Unit 3 is in the Third Ten Year Inservice Inspection (ISI) Interval. FPC intends to implement Relief Request 00-002-II during this interval prior to the next refueling outage scheduled for fall 2001. FPC is requesting approval of this relief request by July 27, 2001 to allow time for implementation prior to the refueling outage. 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

Attachment

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**

**THIRD TEN YEAR INTERVAL**  
**INSERVICE INSPECTION PROGRAM**  
**RELIEF REQUEST 00-002-II**

**THIRD TEN YEAR INTERVAL  
RELIEF REQUEST 00-002-II**

**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:**

All ASME Class 1 and 2 components subject to ultrasonic examination in accordance with the supplements to Appendix VIII to the 1995 Edition with 1996 Addenda of ASME Section XI.

**III. CURRENT CODE REQUIREMENTS AND REQUEST FOR RELIEF:**

The 1989 Edition of ASME Section XI, Appendix VII, Paragraph VII-4240 requires a minimum of 10 hours of annual training.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i) to use the requirements of 10 CFR 50.55a(b)(2)(xiv) in lieu of the provisions of ASME Section XI, Appendix VII, paragraph VII-4240, Annual Training. These examinations will be performed during the Third Ten Year inspection interval.

**IV. ALTERNATE EXAMINATION:**

10 CFR 50.55a was amended in the Federal Register (64 FR 51370), dated September 22, 1999, to adopt by reference the 1995 Edition and Addenda through the 1996 addenda of ASME Section XI, subject to the limitations and modifications listed in subsequent paragraphs. One of these limitations/modifications is contained in 10 CFR 50.55a(b)(2)(xiv) as follows:

**“All personnel qualified for performing ultrasonic examinations in accordance with Appendix VIII shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be completed no earlier than 6 months prior to performing ultrasonic examinations at a licensee’s facility.”**

Annual ultrasonic training shall be conducted in accordance with 10 CFR 50.55a(b)(2)(xiv) in lieu of Section XI, Appendix VII, paragraph VII-4240

**V. BASIS FOR REQUESTING RELIEF:**

As mentioned above, 10 CFR 50.55a was amended in the Federal Register (64 FR 51370) to incorporate by reference the 1995 Edition, with the 1996 Addenda of Section XI including Appendix VIII qualification requirements as modified by paragraph 10

CFR 50.55a(b)(2)(xiv). 10 CFR 50.55a(b)(2)(xiv) requires that all personnel qualified for performing ultrasonic examinations in accordance with Appendix VIII shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be completed no earlier than 6 months prior to performing ultrasonic examinations at a licensee's facility.

Appendix VII, Paragraph VII-4240 of the 1989 Edition of ASME, Section XI, and the 1995 Edition with 1996 Addenda have a similar requirement for 10 hours supplemental training. Paragraph 2.4.1.1.1 in the previously cited Federal Register publication contained the following statement as the basis for modifying the requirements of Appendix VII of ASME Section XI, 1995 Edition with 1996 Addenda to those of 10 CFR 50.55a(b)(2)(xiv):

“The NRC had determined that this requirement (10 hours of training on an annual basis) was inadequate for two reasons. The first reason was that the training does not require laboratory work and examination of flawed specimens. Signals can be difficult to interpret and, as detailed in the regulatory analysis for this rulemaking, experience and studies indicate that the examiner must practice on a frequent basis to maintain the capability for proper interpretation. The second reason is related to the length of training and its frequency. Studies have shown that an examiner's capability begins to diminish within approximately 6 months if skills are not maintained. Thus, the NRC had determined that 10 hours of annual training is not sufficient practice to maintain skills, and that an examiner must practice on a more frequent basis to maintain proper skill level ... The Performance Demonstration Initiative Program (PDI) has adopted a requirement for 8 hours of training, but it is required to be hands-on practice. In addition, the training must be taken no earlier than 6 months prior to performing examinations at a licensee's facility. PDI believes that 8 hours will be acceptable relative to an examiner's abilities in this highly specialized skill area because personnel can gain knowledge of new developments, material failure modes, and other pertinent technical topics through other means. Thus, the NRC has decided to adopt in the Final Rule the PDI position on this matter. These changes are reflected in §50.55a(b)(2)(xiv)...”

Florida Power Corporation (FPC) concurs with the above basis in that the use of the Final Rule requirements (i.e., 8 hours of hands-on training within 6 months prior to the examinations) in lieu of the requirements of Appendix VII for 10 hours of training, on an annual basis, satisfies the need for maintaining adequate skill level and provides an acceptable level of safety.

## **VI. IMPLEMENTATION SCHEDULE:**

Crystal River Unit 3 is in the Third Ten Year Inservice Inspection (ISI) Interval. FPC intends to implement this relief request during this interval.