



Richard B. Abbott
Vice President
Nuclear Engineering

Phone: 315.349.1812
Fax: 315.349.4417

September 18, 2000
NMP1L 1539

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

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

Subject: *Request for Authorization to Use Alternative to ASME Code Section XI Examination Requirements*

Gentlemen:

By letter dated December 27, 1999 (NMP1L 1494), Niagara Mohawk Power Corporation (NMPC) submitted the Third Ten-Year Interval Inservice Pressure Testing Program Plan (Document Number NMP1-PT-003, Revision 0) for Nine Mile Point Unit 1 (NMP1). Section 10 of this Program Plan contains General Relief Request No. GPTRR-1, which would have allowed NMPC to use American Society of Mechanical Engineers (ASME) Section XI Code Case N-566 as an alternative to the system pressure testing requirements of IWA-5250(a)(2), 1989 Edition, of ASME Section XI.

The purpose of this letter is to supercede NMPC's previous submittal of General Relief Request No. GPTRR-1, and propose use of ASME Section XI Code Case N-566-1 as an alternative to the examination requirements of Subarticle IWA-5250(a)(2) of the 1989 Edition of the ASME Code for situations when leakage is detected at bolted connections. Specifically, this alternative will allow the use of ASME Code Case N-566-1, titled "Corrective Action for Leakage Identified at Bolted Connections, Section XI, Division 1." Code Case N-566-1 was approved by the ASME Code Committee on February 15, 1999, but has not yet been endorsed in NRC Regulatory Guide (RG) 1.147, titled "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1." The same relief request for use of Code Case N-566-1 for leakage detected at bolted connections was approved for Nine Mile Point Unit 2 by letter dated April 14, 2000 (TAC No. MA8623).

AD47

Further details concerning NMPC's proposed alternative examination are contained in the attached relief request GPTRR-1. NMPC requests that the NRC review GPTRR-1 pursuant to 10 CFR 50.55a(a)(3)(i) to support the NMP1 Refueling Outage 16, which is currently scheduled to start in March 2001.

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/SHC/jlb
Attachment

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

General Relief Request No. GPTRR-1

Components: Class 1, 2, and 3 Systems

Code Class: 1, 2, and 3

**Examination
Requirement:**

IWA-5250(a)(2), 1989 Edition of ASME Section XI

Basis for Relief:

NMPC requests approval of this alternative in accordance with 10CFR50.55a(a)(3) on the basis that the proposed alternative would provide an acceptable level of quality and safety.

Removal of pressure retaining bolting at mechanical connections for VT-3 visual examination and subsequent evaluation in locations where leakage has been identified is not always the most prudent course of action to determine the condition of the bolting or the cause of the leak.

ASME Section XI Code Case N-566-1 provides the following response to the inquiry, "What alternative to the requirements of IWA-5250(a)(2) may be used when leakage is detected at bolted connections?"

Reply: It is the opinion of the Committee that, as an alternative to the requirements of IWA-5250(a)(2) bolted connections, the requirements of (a) or (b) below shall be met.

(a) The leakage shall be stopped, and the bolting and component material shall be evaluated for joint integrity as described in (c) below.

(b) If the leakage is not stopped, the joint shall be evaluated in accordance with IWB-3142.4 for joint integrity. This evaluation shall include the considerations listed in (c) below.

(c) The evaluation of (a) and (b) above is to determine the susceptibility of the bolting to corrosion and failure. This evaluation shall include the following:

- (1) the number and service age of the bolts;
- (2) bolt and component material;
- (3) corrosiveness of process fluid;
- (4) leakage location and system function;
- (5) leakage history at the connection or other system components;
- (6) visual evidence of corrosion at the assembled connection."

General Relief Request No. GPTRR-1***Basis for Relief:
(continued)***

The IWA-5250(a)(2) requirement to remove, examine, and evaluate bolting in this situation does not allow consideration of other factors, which may indicate the condition of mechanical joint bolting. Nine Mile Point Unit One considers this requirement to be unnecessarily restrictive.

***Alternate
Examination:***

As an alternative to the requirements of IWA-5250(a)(2), Nine Mile Point Unit One shall comply with the guidance and requirements of Code Case N-566-1. Specifically, the requirements of (a) or (b) below shall be met.

- (a) The leakage shall be stopped, and the bolting and component material shall be evaluated for joint integrity as described in (c) below.
- (b) If the leakage is not stopped, the joint shall be evaluated in accordance with IWB-3142.4 for joint integrity. This evaluation shall include the considerations listed in (c) below.
- (c) The evaluation of (a) and (b) above is to determine the susceptibility of the bolting to corrosion and failure. This evaluation shall include the following:
 - (1) the number and service age of the bolts;
 - (2) bolt and component material;
 - (3) corrosiveness of process fluid;
 - (4) leakage location and system function;
 - (5) leakage history at the connection or other system components;
 - (6) visual evidence of corrosion at the assembled connection.

Furthermore if the initial evaluation indicates the need for further examination, appropriate, additional corrective action shall be taken to ensure the integrity of the bolted connection. When required, a Visual Examination VT-1 shall be performed in lieu of the VT-3. The requirements of IWB-3517 shall be applied for the VT-1.