

October 2, 2000

Mr. H. L. Sumner, Jr.  
Vice President - Nuclear  
Hatch Project  
Southern Nuclear Operating  
Company, Inc.  
Post Office Box 1295  
Birmingham, Alabama 35201-1295

SUBJECT: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2 RE: SAFETY  
EVALUATION OF THE CONTAINMENT INSERVICE INSPECTION PROGRAM  
FIRST 10-YEAR INTERVAL REQUEST FOR RELIEF (TAC NOS. MA8690  
AND MA8691)

Dear Mr. Sumner:

By letter dated April 14, 2000, you submitted Relief Requests (RR)-MC-7 and RR-31 for the third 10-Year Interval Inservice Inspection (ISI) Program for Edwin I. Hatch Nuclear Plant, Units 1 and 2. Your letter dated July 17, 2000, superceded your letter dated April 14, 2000, with respect to RR-MC-7; your letter dated September 5, 2000, withdrew RR-31.

The staff has reviewed your submittal dated July 17, 2000, and finds that the proposed alternative to IWA-2300, Qualification and Certification of Nondestructive Examination Personnel, IWA-2310 General will provide an acceptable level of quality and safety. Therefore, the staff concludes that the alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

Sincerely,

*/RA/*

Richard L. Emch, Jr., Chief, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Enclosure: As stated

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
OF THE  
FIRST 10-YEAR INTERVAL INSERVICE INSPECTION  
REQUESTS FOR RELIEF  
FOR  
SOUTHERN NUCLEAR OPERATING COMPANY  
EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2  
DOCKET NOS. 50-321 AND 50-366

1.0 INTRODUCTION

Inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class major component (MC) and cooling components (CC) will be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety; or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(5), if Southern Nuclear Operating Company, Inc. (the licensee), determines that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information will be submitted to the Commission in support of that determination and a request made for relief from the ASME Code requirement. After evaluation of the determination, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and may impose requirements that are determined to be authorized by law, will not endanger life, property, or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed. The containment ISI program for Edwin I. Hatch Nuclear Plant (Hatch), Units 1 and 2, was prepared to meet the requirements of Subsection IWE of the 1992 Edition, 1992 Addenda, of the ASME Code, Section XI.

Pursuant to 10 CFR 50.55a(g)(6)(ii)(B), for ASME Code Class MC and CC (including integral attachments of MC and metallic liners of CC), the licensee will expedite the ISI requirements of

Subsection IWE and Subsection IWL of the 1992 Edition with the 1992 Addenda and complete the first inspection by September 9, 2001.

10 CFR 50.55a(g)(6)(ii)(B)(1) states that the inservice examinations specified for the first period of the first inspection interval in Subsection IWE of the 1992 Edition and addenda as modified in 10 CFR 50.55a(b)(2)(x) will serve the same purpose for operating plants as the preservice examination. 10 CFR 50.55a(g)(6)(ii)(B)(2) allows licensees to implement the inservice examinations which correspond to the number of years of operation which are specified in Subsection IWL of the 1992 Edition and addenda as modified in 10 CFR 50.55a(b)(2)(ix) and will serve the same purpose for operating plants as the preservice examination specified for plants not yet in operation.

By letter dated July 17, 2000, the licensee submitted their proposed alternative to the Section XI requirements for IWE pursuant to 10 CFR 50.55a(a)(3)(i). The NRC staff's evaluation of the licensee's proposed relief request follows.

## 2.0 EVALUATION OF RELIEF REQUEST

### A. Relief Request for IWE Requirements for Class MC Components, IWA-2300, Qualifications of Nondestructive Examination Personnel (NDE), IWA-2310 General

Code Requirement: 10 CFR 50.55a(g)(6)(ii)(B), requires that containment inspection be conducted in accordance with the 1992 Edition, 1992 Addenda, ASME Section XI. IWA-2300, Subarticle IWA-2310 of the 1992 Edition, 1992 Addendum requires that personnel performing nondestructive examinations be qualified and certified in accordance with ANSI/ASNT CP-189.

Licensee's Proposed Alternative: The licensee proposed to use the 1989 Edition for nondestructive examination personnel qualification and certification by ASNT SNT-TC-1A in lieu of ANSI/ASNT CP-189 as required by the 1992 Edition.

HNP will use the 1984 Edition of ASNT SNT-TC-1A for the qualification and certification of NDE personnel for ISI of Class MC and Class CC containments in lieu of ANSI/ASNT SNT-TC-1A CP-189 until the update of the HNP ISI Program for the Fourth 10-Year ISI Interval beginning on January 01, 2006. Concurrent with the ISI Program update, HNP will revise the Containment Inspection Program to require the personnel performing NDE to be qualified and certified using a written practice prepared in accordance with IWA-2300 of the HNP Fourth Ten Year Interval Section XI code of record. IWA-2300 requires the written practice to be prepared in accordance with ANSI/ASNT CP-189 as amended by the requirements of this Division. IWA-2300 also requires recertification of NDE personnel in accordance with the edition of ANSI/ASNT CP-189 referenced in IWA-1600 as amended by the requirements of this Division.

### Licensee's Basis for Proposed Alternative:

10 CFR 50.55a was amended in the Federal Register to require the use of the 1992 Edition, with the 1992 Addenda of the ASME Code, Section XI when performing containment examinations. In addition to the requirements of IWE/IWL, the requirements of subsection IWA of the 1992 Edition, 1992 Addenda of the ASME

Code, Section XI for containment examinations were imposed. IWA-2300 requires qualification of NDE personnel to ANSI/ASNT CP-189.

Currently, the Edwin I. Hatch Nuclear Plant (HNP) Inservice Inspection (ISI) Program requirements for nondestructive personnel are written based upon the 1984 Edition of ASNT SNT-TC-1A, as required by the 1989 edition of the ASME Code, Section XI, which is the HNP code of record. Compliance with the 1992 ASME Code requirements from which relief is requested necessitates establishing a separate and parallel qualification and certification program and duplicating a significant portion of existing procedural controls.

Visual examination is the primary nondestructive method required by Subsections IWE and IWL. Neither ANSI/ASNT CP-189 nor ASNT SNT-TC-1A specifically includes visual examination. Therefore, the Code requires qualification and certification to comparable levels as in ANSI/ASNT CP-189 or ASNT SNT-TC-1A, as applicable, and the employer's written practice. The requirements within ANSI/ASNT CP-189 and ASNT SNT-TC-1A for those methods and levels comparable to visual examination are similar. Ultrasonic thickness examinations may also be required by Table IWE-2500-1. Technically, these examinations are relatively simple and do not require an extensive training and qualification program. The alternative to use the 1984 Edition of ASNT SNT-TC-1A for qualification of NDE personnel for ISI of Class MC and Class CC containments in lieu of the requirements of IWA-2310 is equivalent to the requirements applicable to the HNP ISI Program Class 1, 2, and 3 components. Therefore, the use of ANSI/ASNT CP-189 in place of ASNT SNT-TC-1A will not significantly improve the capability of NDE to perform the examinations required by IWE.

Staff Evaluation: To comply with the expedited examination of containment required by 10 CFR 50.55a(g)(6)(ii)(B), licensees must perform visual examinations on Class MC and metallic liners of Class CC concrete components per the requirements of IWE of ASME Section XI.

IWA-2310 of the 1992 Edition and Addenda of Section XI requires that examination personnel be qualified and certified in accordance with ANSI/ASNT CP-189. The licensee has proposed to conduct examinations with personnel qualified and certified to a written practice based on SNT-TC-1A and the 1989 Edition of Section XI.

Currently, the licensee conducts ISI examinations with personnel qualified and certified in accordance with the 1989 Edition of Section XI for Class 1, 2, and 3 components. The 1989 Edition requires the use of SNT-TC-1A for the qualification and certification of NDE personnel. Therefore, the staff recognizes that, to meet the 1992 Edition with the 1992 Addenda requirements, the licensee would need to develop a second program for qualifying and certifying NDE personnel for containment examinations. The majority of the containment examinations are required by Subsection IWE and are VT-1 and VT-3 visual examinations. Volumetric examinations are required during the containment vessel augmented inspections. The licensee's current method of qualifying and certifying NDE personnel is based on SNT-TC-1A for all other Class 1, 2, and 3 components. Consequently, the staff finds that using NDE personnel qualified by the same means for containment examinations will not compromise the quality of the examination and will provide an acceptable level of quality and safety.

### 3.0 CONCLUSION

The staff has evaluated the licensee's submittal for Hatch, Units 1 and 2. The authorizing of alternatives or granting of relief is based upon fulfillment of any commitments made by the licensee in the basis for relief and the alternative proposed. The implementation of the ISI program and relief request is subject to inspection by the NRC.

The alternative proposed in relief request RR-MC-7 is authorized for the first 10-year ISI containment interval pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that it provides an acceptable level of quality and safety.

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Date: October 2, 2000

Edwin I. Hatch Nuclear Plant

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