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NMP1L 1540

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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: Third Ten-Year Interval Relief Request

Gentlemen:

NRC Information Notice 98-44, "Ten-Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping," states that for licensees that intend to implement a risk-informed inservice inspection (RI-ISI) program for piping and do not have a pilot plant application currently being reviewed by the NRC, the NRC will consider authorizing a delay of up to two years in implementation of the next ten-year ISI program for piping only. Based on this Information Notice and other guidance documents, Nine Mile Point Unit 1 (NMP1) will be using risk-informed methods to develop, monitor, and update the existing ISI program for piping to a more efficient program. Consistent with this effort, Niagara Mohawk Power Corporation (NMPC) requests relief from the American Society of Mechanical Engineers (ASME) Code minimum percentage requirements for examination of certain weld categories delineated in Tables IWB-2412-1 and IWC-2412-1 of Inspection Program B for the first inspection period.

Accordingly, pursuant to 10 CFR 50.55a(a)(3)(i), the attached relief request is submitted for NRC review and approval. NMPC previously submitted a similar request for relief from the Nine Mile Point Unit 2 (NMP2) ISI program requirements on September 15, 1999. The NRC approved the request in a letter dated December 14, 1999. The attached relief request for NMP1 addresses the additional information requested by the NRC in reviewing the request for NMP2. NMPC requests that the NRC approve the request no later than December 1, 2000, so that we can appropriately plan the ISI scope for the upcoming NMP1 refueling outage, scheduled for the spring of 2001.

Very truly yours,

Richard B. Abbott

Vice President Nuclear Engineering

RBA/JWC/kap
Enclosure

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
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**NINE MILE POINT UNIT 1
THIRD INSERVICE INSPECTION INTERVAL
RELIEF REQUEST ISI-13**

A. COMPONENT IDENTIFICATION

System: Various Systems
 Class: Quality Group A, and B, (ASME Code Class 1, and 2)
 Component Description: Piping Circumferential Welds

B. ASME SECTION XI EXAMINATION REQUIREMENTS

American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code (B&PVC), Section XI, Tables IWB-2500-1 and IWC-2500-1, Examination Categories B-F, B-J, C-F-1, C-F-2, and United States Nuclear Regulatory Commission (USNRC) Generic Letter (GL) 88-01 Category A welds. The required examinations in each Examination Category shall be completed during each successive inspection interval in accordance with Inspection Program "B", Tables IWB-2412-1 and IWC-2412-1 and GL 88-01 guidelines, as defined in Table 1 below.

Table 1 ASME Section XI and GL 88-01 Examination Requirements				
ASME Code Class	Examination Category	Total Circumferential Welds	Total Circumferential Welds Required	Percentage Requirements
1	B-F	39	38	100% Required *
1	B-J	591	148	25% Required
1	GL-A	131	33	25% Required
2	C-F-1	72	28	7.5% Required
2	C-F-2	758	57	7.5% Required
2	GL-A	12	3	25% Required

* Weld 33-WD-014 is inaccessible and addressed in Request for Relief ISI-12.

C. RELIEF REQUESTED

Pursuant to 10 CFR 50.55a(a)(3)(i), Niagara Mohawk Power Corporation (NMPC) requests relief from the minimum examination requirements specified in Tables IWB-2412-1 and IWC-2412-1 of the ASME B&PVC, Section XI, Division 1, for the First Inservice Inspection Period (December 26, 1999 to December 25, 2002), as defined below in Table 2 (including GL 88-01, Category "A" percentage requirements).

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Table 2 Inspection Program B			
Inspection interval	Inspection Period Calendar Years of Plant Service	Minimum Examinations Completed, %	Maximum Examinations Credited, %
3 RD Inservice Inspection Interval	23	16	34
	27	50	67
	30	100	100

Reference: Tables IWB-2412-1 and IWC-2412-1

In addition, NMPC requests a delay of 2 years from December 26, 1999, or through refueling outage (RFO)-16, whichever is later, for conforming to the piping weld examination requirements of the 1989 Edition of the ASME Code, Section XI, for the Third Ten-Year Inservice Inspection Interval at NMP1, as allowed in USNRC Information Notice 98-44.

D. BASIS FOR RELIEF

The Updated Inservice Inspection Program, Plan, and schedule for NMP1 Third Inservice Inspection Interval was submitted to the USNRC Staff on October 30, 1999.

The first NMP1 refueling outage of the third interval (RFO-16) is scheduled to begin in March 2001. This request for relief would provide for the elimination of ASME Code Class 1 and 2 piping weld examinations that may no longer be required once NMP1's Risk-Informed Inservice Inspection (RI-ISI) Program for piping is implemented. This request for relief would also include 143 (127 Class 1, 16 Class 2) USNRC GL 88-01, Category A piping welds.

All required augmented examinations, with the exception of Category A (resistant material) welds of GL 88-01, will be performed as scheduled during RFO-16. The table below provides a summary of these categories.

GL 88-01 Categories	Total Number of Welds	Examination Frequency	Total Number of Welds Scheduled for Interval	Total Number of Welds Scheduled for RFO-16
D	142	Every 2 refueling outages	284	79
E	1	Once every 2 refueling outages	2	0
F	5	* Each refueling outage	16	4
G1	14	VT-2 each outage	56	14
G2	24	Expanded Sample	0	0
Total	38		56	14
S	6	10% each refueling outage	12	3

* Weld 32-WD-050 is being re-examined under IWB-2420(b), acceptable per USNRC, dated July 23, 1999 (TAC No. MA5696)

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In Information Notice 98-44, the USNRC Staff stated that the performance of augmented examinations would be unaffected by USNRC approved delays in updating ISI programs to accommodate development of risk-informed ISI Programs.

USNRC Information Notice 98-44, titled "Ten Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping," states that the probabilistic risk assessment technology in USNRC regulatory activities should be increased to the extent supported by state of the art methods and data and in a manner that complements the USNRC's deterministic approach. Basically, this information combined with risk-assessment techniques and associated data, can be used to develop a more effective approach to the ISI program, specifically the piping. This program is practical and provides an acceptable level of quality and safety, as required by 10 CFR 50.55a(a)(3)(i).

E. ALTERNATIVE EXAMINATIONS

In accordance with 10 CFR 50.55a(a)(3)(i), NMPC proposes an alternative to the examination percentage requirements of Inspection Program B. Specifically, NMPC proposes to develop the RI-ISI program in accordance with ASME Code Case N-578, utilizing the EPRI methodology applied to ASME Code Class 1, 2 and 3 piping and in accordance with EPRI TR 112657 and Regulatory Guide 1.178. When the RI-ISI Program is established, all examinations required by the risk-informed methodology would be accomplished by the end of the Third Ten-Year Inservice Inspection Interval that is scheduled for completion on December 25, 2009.

NMPC plans to develop and implement a RI-ISI methodology for RFO-17 in March-April of 2003.

F. IMPLEMENTATION SCHEDULE

Third Inservice Inspection Interval, First Inspection Period, December 26, 1999 to December 25, 2002.

Submit RI-ISI Program no later than February, 2002 for implementation in the Second Inservice Inspection Period, RFO-17.

G. ATTACHMENTS

None