



September 28, 2000
NMP1L 1542

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Richard B. Abbott
Vice President
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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: Inservice Inspection Relief Request ISI-12 (TAC No. MA7129)

Gentlemen:

By letter dated October 30, 1999 (NMP1L 1480), Niagara Mohawk Power Corporation submitted the Third Ten-Year Interval ASME Code Section XI Inservice Inspection (ISI) Program Plan (Document Number NMP1-ISI-003, Revision 0) for Nine Mile Point Unit 1. Relief Requests for the third interval, which began on December 26, 1999, were included in this Program Plan.

Relief Request ISI-12, which was included in the previous Program Plan submittal, has been updated to address NRC Staff comments and Appendix VIII considerations. The attached updated Relief Request supersedes the previously submitted version.

Inservice inspections affected by the relief requests submitted as part of the third interval program, including ISI-12, are scheduled to be performed during Refueling Outage 16. Therefore, NRC approval of these relief requests, pursuant to 10CFR50.55a(g)(6)(i), is requested by March 1, 2001.

Very truly yours,

Richard B. Abbott
Vice President Nuclear Engineering

RBA/JJD/kap
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

A047

**NINE MILE POINT UNIT 1
THIRD INSERVICE INSPECTION INTERVAL
RELIEF REQUEST ISI-12**

A. COMPONENT IDENTIFICATION

System: Various

Class: Augmented Quality Group A, (ASME Code Class 1)

Component Description: Nonconforming Service Sensitive Piping Welds.

B. AUGMENTED INSERVICE INSPECTION GUIDELINES (USNRC GENERIC LETTER 88-01)

Generic Letter 88-01, "NRC Position on Intergranular Stress Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping", requires augmented volumetric examination of nonconforming service-sensitive piping welds.

C. RELIEF REQUESTED

Relief is requested from performing full volumetric examination of nonconforming service sensitive piping welds. Relief is requested for twenty-one (21) of the augmented piping welds.

D. BASIS FOR RELIEF

The welds listed on the attached Table were not fully examined by volumetric and/or surface examination methods during the first and second 10-year intervals due to limitations of design, geometry, and material of construction.

The dendritic weld structure of the stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In particular, non-parallel surfaces and product form of the material of valves preclude meaningful ultrasonic examination from the valve side.

Three (3) stainless steel welds continue to be limited by configuration, two (2) by permanent attachment to the piping and sixteen (16) due to inaccessibility, welds located inside containment penetrations. The ultrasonic examination volume and surface examination area that were completed during the previous interval are tabulated with the percentages achieved and a summary of obstruction on the attached Table.

10 CFR 50.55a(g)(6)(ii)(C) requires accelerated implementation of the ASME Code Section XI, 1995 Edition with 1996 Addenda, Appendix VIII, "Performance Demonstration for Ultrasonic Examination Systems". 10 CFR 50.55a(b)(2)(xv)(A), 10 CFR 50.55a(b)(2)(xv)(G) and 10 CFR 50.55a(b)(2)(xvi) define new requirements for examination coverage and qualification demonstration. These requirements affect austenitic piping.

Current technology is not capable of reliably detecting or sizing flaws on the far side of an austenitic weld. Additionally, no qualified procedures for single side examinations on austenitic piping currently exist. As use of Appendix VIII will affect the percentage of volume that can be claimed, a column has been added to the attached Table that provides the approximate coverage that can be credited under the new requirements for this interval. Actual percentages will not be known until the completion of the examinations, at which time the actual Appendix VIII coverage will be incorporated in conjunction with the performance Demonstration Initiative (PDI) single side requests for relief.

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E. ALTERNATE EXAMINATION

Perform ultrasonic and/or surface examinations to the extent practical.

Perform a Visual (VT-2) examination of the inaccessible intergranular stress corrosion cracking (IGSCC) Category welds each refueling outage for evidence of leakage per previous commitment contained in Niagara Mohawk Power Corporation (NMP) submittals dated July 28, 1988 (NMP1L 0290), and September 4, 1990 (NMP1L 0523).

The extent of examinations proposed, together with the other pressure tests (as applicable), provide an acceptable level of assurance of nonconforming service sensitive piping weld integrity.

G. USNRC STATUS

Pursuant to 10 CFR 50.55a(g)(6)(i), a similar request for relief was granted per USNRC Safety Evaluation, dated April 6, 1994, TAC No. M83099, for the second inspection interval.

Approval of the request for relief for the second inspection interval also included the commitment in submittals dated July 28, 1988 and September 4, 1990, to perform a visual examination of the inaccessible IGSCC Category welds each refueling outage for evidence of leakage.

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RELIEF REQUEST ISI-12**

COMPONENT IDENTIFICATION/DESCRIPTION	EXAMINATION METHOD	EXTENT EXAMINED	ESTIMATED APPENDIX VIII COVERAGE	LIMITATION
40-WD-050-A VALVE 40-12 TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-14
40-WD-010A VALVE 40-02 TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-13A
40-WD-005 PIPE TO ELBOW	PT UT	86% SURF 79.3% VOL	N/A 50% VOL	PERMANENT HANGER OBSTRUCTION
40-WD-006 PIPE TO PIPE	PT UT	100% SURF 94.4% VOL	N/A 50% VOL	PERMANENT HANGER INTERFERENCE
40-WD-011 ELBOW TO PIPE	PT UT	25% SURF 100% VOL	N/A 50% VOL	INACCESSIBLE INSIDE PENETRATION X-13A
40-WD-051 PIPE TO ELBOW	PT UT	100% SURF 50% VOL	N/A 40% VOL	INACCESSIBLE INSIDE PENETRATION X-14
37-WD-003 REDUCER TO FLANGE	PT UT	100% SURF 100% VOL	N/A 50% VOL	FITTING CONFIGURATION
39-09R-WD-001 VALVE 39-09R TO PENETRATION	PT UT	100% SURF 0% VOL	N/A 0% VOL	CONFIGURATION (Valve to Penetration)
39-10R-WD-001 VALVE 39-10R TO PENETRATION	PT UT	100% SURF 0% VOL	N/A 0% VOL	CONFIGURATION (Valve to Penetration)
39-WD-194 VALVE 39-05 TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-5B
39-WD-194A PIPE TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-5B
39-WD-226 VALVE 39-06 TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-5A
39-WD-226A PIPE TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-5A
38-WD-007 PIPE TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-8
38-WD-008 PIPE TO VALVE 38-02	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-8
38-WD-087 VALVE 38-12 TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-7
38-WD-088 PIPE TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-7
33-WD-014 PIPE TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-9
33-WD-036 PIPE TO ELBOW	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-154
33-WD-035 VALVE 33-03 TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-154
33-WD-015 VALVE 33-04 TO PIPE	PT UT	0% SURF 0% VOL	N/A 0% VOL	INACCESSIBLE INSIDE PENETRATION X-9