

Commonwealth Edison Company
35100 South Road # 53, Suite 88
Braceville, IL 60407-9679
Tel 815-458-2800



October 16, 2000
BW000103

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555 - 0001

Braidwood Station, Units 1 and 2
Facility Operating License Nos. NPF-72 and NPF-77
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Braidwood Station Interval 2 Inservice Inspection Program:
Relief Request I2R-35, "Alternative Requirements for Qualification of VT-2
Examination Personnel"

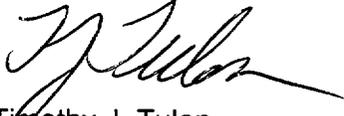
As required by 10 CFR 50.55a(3), Braidwood Station is submitting, for U. S. Nuclear Regulatory Commission (NRC) approval, a proposed alternative to the 1989 edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." This proposed relief request modifies the qualification requirements of personnel who perform visual examinations to detect evidence of leakage from pressure retaining components during inservice inspections, that is, VT-2 examination personnel qualification. The alternative proposed by Braidwood Station utilizes ASME Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel Section XI, Division 1."

The use of the alternative qualification requirements is being proposed under 10 CFR 50.55a(a)(3)(i). The discussion contained in the attached relief request demonstrates that the proposed alternative would provide an acceptable level of quality and safety. Braidwood Station is requesting resolution of the proposed alternative by June, 2001.

A047

Please direct any questions you may have regarding this submittal to Mr. T. W. Simpkin,
Regulatory Assurance Manager, at (815) 458-2801, x2980.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Tulon', with a long horizontal flourish extending to the right.

Timothy J. Tulon
Site Vice President
Braidwood Station

Attachment: Relief Request I2R-35, Alternative Requirements for Qualification of VT-2
Examination Personnel

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Braidwood Station

Attachment

Relief Request I2R-35
Alternative Requirements for Qualification of VT-2 Examination Personnel

**RELIEF REQUEST: I2R-35
REVISION 0
(Page 1 of 2)**

COMPONENT IDENTIFICATION

Code Class:	1, 2, and 3
Reference:	IWA-2300
Examination Category:	N/A
Item Number:	N/A
Description:	Alternative Requirements for Qualification of VT-2 Examination Personnel.
Component Numbers:	Class 1, 2, and 3 Pressure Retaining Components.

CODE REQUIREMENTS

Section XI, Subarticle IWA-2300 and Paragraph IWA-2312 require personnel performing nondestructive examinations not listed in SNT-TC-1A to be qualified and certified to a comparable level of qualification as defined in SNT-TC-1A and the Employer's written practice.

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis the proposed alternatives would provide an acceptable level of quality and safety.

Section XI currently requires personnel conducting VT-2 examinations to be qualified and certified to comparable levels of qualification as defined in SNT-TC-1A and the Employer's written practice. However, unlike the nondestructive testing methods addressed within SNT-TC-1A, or VT-1 and VT-3 examination methods, VT-2 examination does not require any special knowledge of technical principals underlying its performance. It is only the straight forward examination for leakage. No special skills or technical training are required in order to observe water dripping from a component or bubbles forming on a joint wetted with leak detection solution. As such, VT-2 personnel should not be subject to the same qualification and certification requirements that were established for nondestructive testing personnel. Code Case N-546 provides more applicable requirements for the qualification and certification of VT-2 inspection personnel.

RELIEF REQUEST: I2R-35
REVISION 0
(Page 2 of 2)

BASIS FOR RELIEF (Cont.)

Code Case N-546 requires that personnel performing VT-2 visual examinations have at least forty (40) hours of plant walkdown experience, receive a minimum of four (4) hours of training on Section XI requirements, and pass the vision test requirements of IWA-2321, 1995 Edition. This alternative to the existing Code requirements reduces the administrative burden of maintaining a Section XI qualification and certification program for VT-2 examiners and allows for the use of personnel most familiar with the walkdown of plant systems, such as licensed and nonlicensed operators, local leak rate personnel, system engineers, and NDE personnel to perform VT-2 visual inspections. The quality of VT-2 visual examinations will be maintained by using the alternate qualification rules approved by ASME in Code Case N-546.

Code Case N-546 was approved by the ASME Boiler and Pressure Vessel Code Committee on August 24, 1995, but is not yet included in the most recent listing of NRC approved code cases provided in Revision 12 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1".

PROPOSED ALTERNATE PROVISIONS

Braidwood Station will use the provisions of Code Case N-546 as alternatives to the requirements of Section XI, IWA-2300 for qualifying VT-2 visual inspectors. In addition, all VT-2 examinations are performed using a common VT-2 procedure ensuring consistent, quality examinations and all results are independently reviewed by a Braidwood Station Level III as well as the Authorized Nuclear Inservice Inspector.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for Braidwood Units 1 and 2.