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October 30, 2000

Re: Indian Point Unit No. 2
Docket No. 50-247
NL-00-132

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555-0001

Subject: Relief Request to Allow Use of ASME Code Case N-546 (Relief
Request No. 56)

Reference: Con Edison Letter to USNRC dated August 30, 2000

Pursuant to 10 CFR 50.55a(a)(3), Consolidated Edison Company of New York, Inc. (Con Edison) hereby requests relief from certain requirements of the American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel Code for Indian Point Unit 2. Specifically, relief is requested to allow the use of ASME Code Case N-546 instead of the qualification and certification requirements for VT-2 visual examination personnel found in IWA-2300. The attached relief request supercedes our previously transmitted request dated August 30, 2000. Attachment 1 contains the basis for this relief request.

Commitments made by Con Edison contained in this letter are listed in Attachment 2.

Should you or your staff have any questions regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing.

Very truly yours,



Attachment

A047

C: Mr. Hubert J. Miller
Regional Administrator-Region I
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Mr. Patrick D. Milano, Senior Project Manager
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ATTACHMENT 1

Relief Request No. 56

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
Docket No. 50-247
October 2000

RELIEF REQUEST NUMBER 56

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REFERENCE CODE: American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 1989 Edition with no Addenda. IWA-2310

COMPONENTS FOR WHICH RELIEF IS REQUESTED:

Components subject to VT-2 visual examinations.

CURRENT CODE REQUIREMENTS AND REQUEST FOR RELIEF:

Pursuant to 10 CFR 50.55a(a)(3)(i), Consolidated Edison is requesting relief from the ASME Section XI, Subsection IWA-2300 requirements for the qualification and certification of VT-2 visual examination personnel.

As an alternative, Consolidated Edison proposes to use the alternate requirements identified in Code Case N-546 and additional testing and re-certification requirements, as described below. This alternate requirement provides an acceptable level of quality and safety.

BASIS FOR RELIEF:

ASME Section XI, 1989 Edition, Subsection IWA-2300 requires that VT-2 visual examination personnel be qualified to and certified in accordance with ASNT SNT-TC-1A. The Code also requires that the examination personnel be qualified for near and far distance vision acuity. This relief request proposes to use ASME Code Case N-546 which contains alternate requirements for the certification and qualification of VT-2 visual examination personnel. In addition to the 4 hours of training specified in Code Case N-546, subsequent testing to demonstrate knowledge of Section XI requirements and plant specific procedures for VT-2 visual examination shall be required. Furthermore, in order to maintain this qualification, these examination personnel shall be re-certified every 3 years. Consolidated Edison believes that this alternative is acceptable pursuant to 10 CFR 50.55a(a)(3)(i) as it will provide an acceptable level of quality and safety.

As stated in Code Case N-546, plant personnel (e.g., licensed and non-licensed operators, system engineers, and testing technicians) with the specific training and plant walkdown experience need not be qualified nor certified to ASNT SNT-TC-1A or ASNT CP-189 requirements. Experience in identifying equipment problems and knowledge of operating conditions will enhance the ability of plant personnel to locate leakage during VT-2 examinations. With the specified 4 hours of training, followed by subsequent testing to demonstrate knowledge of Section XI requirements and plant specific procedures for VT-2 examinations, the designated plant personnel will understand how leaks should be identified and documented and be fully capable of performing VT-2 examinations. In order to maintain this qualification, examination personnel shall be re-certified every 3 years.

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Qualifying personnel for VT-2 examinations under Code Case N-546 is less burdensome than qualifying and maintaining the present VT-2 certification. Adopting this Code Case makes it feasible to train more people to perform these tasks. Furthermore, using personnel who are already required to perform functions in the plant will reduce the number of people required to enter into those areas that have radiological restrictions, resulting in fewer plant workers being exposed to potential radiation dose and keeping radiation exposure as low as reasonably achievable. Additionally, use of on-shift personnel will improve the process of returning systems to service. Prompt return of safety systems to service will improve the safety of the plant and reduce risk to the public.

PROPOSED ALTERNATIVE EXAMINATIONS:

Consolidated Edison proposes the following alternative qualification requirements for VT-2 visual examination personnel:

- a) At least 40 hours of plant walkdown experience, such as that gained by licensed and non-licensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel;
- b) At least 4 hours of training, followed by subsequent testing to demonstrate knowledge of Section XI requirements and plant specific procedures for VT-2 visual examination shall be required. In order to maintain this qualification, examination personnel shall be re-certified every 3 years; and
- c) Vision test requirements of IWA-2321, 1995 Edition.

PERIOD FOR WHICH RELIEF IS REQUESTED:

Relief is requested for the remainder of the third inspection interval, July 1, 1999 through June 30, 2004. Furthermore, this interval has been extended to May 18, 2005 as discussed in Con Edison Letter to USNRC dated April 9, 1999.

ATTACHMENT 2

Regulatory Commitments / Relief Request No. 56

Consolidated Edison Company of New York, Inc.
Indian Point Unit No. 2
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October 2000

The following list identifies those actions committed to by Con Edison in this document. No further regulatory commitments are contained herein.

<u>Commitment</u>	<u>Due Date</u>
<p><i>With respect to the use of ASME Code Case N-546, the following additional requirements shall apply.</i></p> <p>“At least 4 hours of training, followed by subsequent testing to demonstrate knowledge of Section XI requirements and plant specific procedures for VT-2 visual examination shall be required. In order to maintain this qualification, examination personnel shall be re-certified every 3 years.”</p>	Upon implementation of relief request.