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U. S. Nuclear Regulatory Commission  
Attn.: Document Control Desk  
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Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED RELIEF REQUEST NO. RR-20 TO  
REVISE THE QUALIFICATION AND  
CERTIFICATION OF NDE PERSONNEL FOR  
SECTION XI IWE AND IWL EXAMINATIONS  
PLA-5249**

**Docket Nos. 50-387  
and 50-388**

The purpose of this letter is to request relief from the qualification and certification of nondestructive examination (NDE) personnel requirements of the ASME Code, section XI, subsections IWE and IWL. This relief request will allow for NDE visual examinations utilizing SNT-TC-1A, instead of CP-189 for Section XI, subsections IWE and IWL. The relief request is being submitted in accordance with 10CFR50.55a(a)(3)(ii) in that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

In 1996, 10CFR50.55a was amended (in 61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. This Edition requires that CP-189 be used to determine the qualification and certification for NDE personnel. Prior to 1996, the 1989 Edition of the ASME Code was in effect which required that SNT-TC-1A be used for the qualification and certification of NDE personnel. Neither CP-189 nor SNT-TC-1A specifically includes requirements for visual examinations; therefore, the qualifications and certification for visual examinations are the same for both programs. The existing visual examination program, utilizing SNT-TC-1A, is in accordance with Code requirements.

To implement a CP-189 program would require the development and administration of a second or consolidated program which would not enhance safety or quality and would serve as a burden, particularly in developing an additional written practice, tracking of

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certifications, duplication of paperwork, etc. This duplication would also apply to NDE vendor programs. Therefore, this relief request is being submitted in accordance with 10CFR50.55a(a)(3)(ii) to continue to use the SNT-TC-1A program for the qualification and certification of NDE personnel.

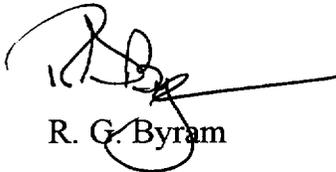
Similar relief requests have been submitted and approved by the NRC. These include, in part:

- Vermont Yankee Nuclear Power Corporation, approved on May, 19, 2000;
- South Carolina Electric & Gas Company, approved on April 6, 2000; and
- Energy Northwest, approved on March 15, 2000.

PPL Susquehanna, LLC requests that this relief request be approved by January 15, 2001, in order to support the Unit 2 10<sup>th</sup> Refuel Outage that is scheduled to begin in March 2001. This relief request will remain in effect for the duration of the Second 10-Year Interval of the Inservice Inspection Program for Susquehanna SES Units 1 and 2 (June 1, 2004).

Please contact Mr. R. D. Kichline at 610 774-7705, if there are any questions concerning this submittal.

Sincerely,



R. G. Byram

Attachment

cc: Regional Administrator – Region I  
Mr. S. L. Hansell, NRC Sr. Resident Inspector  
Mr. R. G. Schaaf, NRC Sr. Project Manager

**PPL, Susquehanna, LLC**  
**Susquehanna SES – Units 1 and 2**  
**Second 10-Year Interval**

**RELIEF REQUEST RR-20**

**System/Component(s) For Which Relief Is Requested**

This relief request applies to the Qualification and Certification of nondestructive examination (NDE) personnel for IWE and IWL components.

**Code Requirements**

10CFR50.55a(g)(4)(v) requires Class MC (IWE) and CC (IWL) pressure retaining components and their integral attachments to meet the applicable ASME Section XI examination and inspection requirements (1992 Edition with the 1992 addenda).

**Relief Requested**

Relief is requested from the provisions of Subarticle IWA-2300, “Qualification of Nondestructive Examination Personnel” to continue basing all requirements for initial certification and re-certification of nondestructive examination personnel on the 1989 Edition of Section XI including the use of ANST SNT-TC-1A, 1984, as amended by IWA-2300 and Appendix VII, 1989 Edition. Subarticle IWA-2300 presently requires NDE personnel to be qualified and certified using a written practice in accordance with CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel, as amended by the requirements of this Division.

**Basis For Relief**

10CFR 50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. A written practice based on the requirements of CP-189, as amended by the requirements of the Subarticle IWA-2300, to implement Subsection IWE and Subsection IWL duplicates efforts already in place for all other subsections. 10CFR 50.55a references the 1989 Edition of ASME Section XI for all other subsections. Subarticle IWA-2300 of the 1989 Edition requires a written practice based on SNT-TC-1A, as amended by the requirements of Subarticle IWA-2300. Further, Subarticle

## **RELIEF REQUEST RR-20**

IWA-2300 of the 1992 Edition, 1992 Addenda, states, "Certification based on SNT-TC-1A are valid until recertifications is required." Visual examination is the primary nondestructive examination method required by Subsections IWE and IWL. Neither CP-189 nor SNT-TC-1A specifically includes visual examination; thus, the Code requires qualification and certification to comparable levels as defined in CP-189 or SNT-TC-1A, as applicable, and the Employer's written practice. Development and administration of a second program would not enhance safety or quality and would serve as a burden, particularly in developing a second written practice, tracking of certifications, and duplication of paperwork. This duplication would also apply to NDE vendor programs.

Relief is requested in accordance with 10CFR 50.55(a)(3)(ii). Compliance with the specified requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

### **Alternative Provisions**

Examinations required by Subsection IWE and IWL shall be conducted by personnel qualified and certified to a written practice based on SNT-TC-1A to the requirements contained in the 1989 Edition of ASME Section XI.

### **Applicable Time Period**

PPL Susquehanna, LLC requests that this relief request be approved by January 15, 2001, in order to support the Unit 2 10<sup>th</sup> Refuel Outage that is scheduled to begin in March 2001. This relief request will remain in effect for the duration of the Second 10-Year Interval of the Inservice Inspection Program for Susquehanna SES Units 1 and 2 (June 1, 2004).