



Nuclear Management Company, LLC
Point Beach Nuclear Plant
6610 Nuclear Road
Two Rivers, WI 54241

NPL 2000-0481

November 2, 2000

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
ASME SECTION XI, SUBSECTION IWE/IWL
CONTAINMENT INSPECTION PROGRAM RELIEF REQUESTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with 10 CFR 50.55a(a)(3), Nuclear Management Company, LLC's Point Beach Nuclear Plant (PBNP) is requesting relief from specific requirements of ASME Boiler & Pressure Vessel, Section XI, 1992 Edition, 1992 Addenda, Subsection IWE for Class MC components with Relief Requests ERR-1 through ERR-9. Relief Request LRR-1 applies to specific requirements of ASME Boiler & Pressure Vessel, Section XI, 1992 Edition, 1992 Addenda, Subsection IWL for Class CC components.

These relief requests are for initial implementation of the containment inspection program required to be implemented by September 9, 2001, in accordance with 10CFR 50.55a as amended in the Federal Register (61FR41303).

Should you have any questions or require additional information, please contact us.

Sincerely,

D. E. Cole
Manager,
Site Assessment

Attachment

cc: NRC Resident
NRC Project Manager

NRC Regional Administrator
PSCW

A047

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-1
SEALS & GASKETS**

COMPONENT

All seals and gaskets of Class MC pressure retaining components performing a leak-tight integrity function.

EXAM AREA

Seal and gasket surfaces

COMPONENT DRAWING

PBC-302, 304, 305 and 312

ASME SECTION XI CATEGORY

Examination Category E-D, Table IWE-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER

E5.10 and E5.20

ASME SECTION XI EXAMINATION REQUIREMENT

IWE-2500, Table IWE-2500-1 requires seals and gaskets on airlocks, hatches, and other devices to be VT-3 examined once each interval to assure containment leak-tight integrity.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested from performing the Code-required visual examination, VT-3, on metal containment seals and gaskets.

BASIS FOR RELIEF:

Airlocks: The personnel access airlock and equipment access airlock utilize an inner and outer door with double seal "O" ring grooved surfaces to ensure a leak-tight integrity. The airlocks also have other gaskets and seals such as the operating shaft assembly seals, door sight-glass seals and gaskets, and equalizing pressure connections that require disassembly to gain access to the gaskets and seals.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-1
SEALS & GASKETS**

Seal or gasket replacement in the airlocks as a result of either corrective or preventive maintenance require as-found and as-left testing in accordance with 10 CFR 50, Appendix J. Degradation of the seal or gasket material is revealed by an increase in the leakage rate noted in routine testing program.

Electrical Penetrations: One type of electrical penetration uses a header plate attached to a containment penetration nozzle flange with redundant O-rings between the header plate and flange face. Modules through which electrical conductors pass are installed in the header plate. Another type, manufactured by Westinghouse (modular type) uses a double O- ring resilient seal to assure leak-tight integrity. A third type of electrical penetration manufactured by Conax uses a compression lead ferrule fitting connection at the header plate. At the end of the feed-through tube module, a resilient seal is located at the tube to electrical cable interface in the Conax electrical penetration. All three types of electrical penetrations are pressurized with dry nitrogen between the seals to prevent moisture intrusion and provides a means to monitor seal degradation for the electrical penetrations.

Examination of seals and gaskets require disassembly of the electrical penetration to gain access to the seals and gaskets. This requires a pre-maintenance Appendix J test, determination of cables at electrical penetrations, disassembly of the joint, removal and examination of the seals and gaskets, reassembly of the joint, re-termination of the cables, post-maintenance testing of the cables, and post-maintenance Appendix J test of the penetration.

Similarly, the containment airlocks and bolted mechanical penetrations require a pre-maintenance Appendix J test, disassembly of the joint, removal and examination of the seals and gaskets, reassembly of the joint and post-maintenance Appendix J test of the penetration. The ASME Section XI requirement imposes the risk that equipment could be damaged. Without disassembly, most of the surface of the seals and gaskets would not be accessible.

Seals and gaskets receive a 10 CFR 50 Appendix J Type B test. For those penetrations that are routinely disassembled, a pre-maintenance test and a post-maintenance test are required. Routine 10 CFR 50 Appendix J testing at the periodicity of the Appendix J Option B testing program reveal degrading leak-tight integrity of these seals and gaskets. Since the Type B test will assure the leak-tight integrity of primary containment, the performance of the visual examination will not increase the level of safety or quality.

Repair and replacement of seals and gaskets is not subject to ASME Section XI (1992 Edition, 1992 Addenda) rules in accordance with IWA-4111(b)(5).

Disassembly of joints to perform the VT-3 examinations is not warranted. Visual examination of seals and gaskets in accordance with IWE-2500, Table IWE-2500-1 is a burden without a compensating increase in the level of safety or quality.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-1
SEALS & GASKETS**

Relief is requested in accordance with 10 CFR 50.55a(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. This requirement is not included in ASME Section XI, 1998 Edition. Testing the seals and gaskets in accordance with 10 CFR 50, Appendix J Option B provides adequate assurance of the leak-tight integrity of the seals and gaskets.

ALTERNATIVE EXAMINATION(S):

The leak-tightness of seals and gaskets will be tested in accordance with 10 CFR 50, Appendix J Option B as required by Category E-P Item E9.40. No additional alternatives to the visual VT-3 of seals and gaskets will be performed.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-2
PRESERVICE OF REAPPLIED PAINT OR COATINGS**

COMPONENT:

Containment Pressure Components with Protective Coatings

EXAM AREA:

All accessible surface areas with protective coatings

IWE COMPONENT DRAWING:

PBC-300 and 301

ASME SECTION XI CATEGORY:

Examination Category E-A, Table IWE-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

E1.12

ASME SECTION XI CODE REQUIREMENTS:

IWE -2200(g) requires that when paint or coatings are reapplied, the condition of the new paint or coating shall be documented in the preservice examination records.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Request relief from examination of reapplied paint or coatings as required by IWE-2200(g).

BASIS FOR RELIEF:

Neither paint nor coatings contribute to the structural integrity or leak-tightness of the containment and are not subject to ASME Section XI rules for repair or replacement. This requirement was removed in ASME Section XI, 1998 Edition, Subsection IWE. In SECY 96-80 dated April 17, 1996, response to Comment 3.2 about IWE-2200(g) states, "In the NRC's opinion, this does not mean that a visual examination must be performed with every application of paint or coating. A visual examination of the topcoat to determine the soundness and the condition of the topcoat should be sufficient." Documentation of the adequacy of the newly applied coating is provided within the quality controlled coating application procedure, regardless of the reason for the need to apply the coating. An additional visual examination to

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-2
PRESERVICE OF REAPPLIED PAINT OR COATINGS**

meet the requirements of IWE-2200(g) does not increase the level of quality or safety of the containment.

The paint or coating is not an ASME Section XI component but visible indications on the paint or coating may be the result of a degrading base material. If the base material is affected, then successive inspections in accordance with IWE-2420(b) and (c) will be required following coating reapplication. Should deterioration of the coating in the reapplied area occur, the area will require additional evaluation regardless of the preservice record. Recording the condition of the new paint or coatings in the preservice records does not increase the level of quality and safety of containment.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). Reapplication of coatings in accordance with a quality controlled coating application procedure provides an adequate level of quality and safety.

ALTERNATE EXAMINATION:

Reapplication of coatings on the containment pressure boundary will be examined in accordance with the quality controlled coatings application procedure. Although repairs to paint or coatings are not subject to the repair/replacement rules of ASME XI (Interpretations No. 42; XI-1-98-14), repair to the primary containment boundary, if required, would be conducted in accordance with ASME Section XI Code rules. Successive exams will be conducted in accordance with IWE 2420(b) and (c) as required.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-3
VT PRIOR TO PAINT OR COATING REMOVAL**

COMPONENT:

Containment Pressure Components with Protective Coatings

EXAM AREA:

All accessible surface areas with protective coatings

IWE COMPONENT DRAWING:

PBC-300, and 301

ASME SECTION XI CATEGORY:

Examination Category E-A, Table IWE-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

E1.12

ASME SECTION XI CODE REQUIREMENTS:

IWE-2500(b) requires when paint or coatings are to be removed, the paint or coating shall be visually examined in accordance with Table 2500-1 prior to removal.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Request relief from examination of paint or coating prior to removal as required by IWE-2500(b).

BASIS FOR RELIEF:

Neither paint nor coatings contribute to the structural integrity or leak-tightness of the containment and are not subject to ASME Section XI rules for repair or replacement. The requirements to examine the paint or coating prior to removal were removed in ASME Section XI, 1998 Edition, Subsection IWE.

The need to remove the paint or coating to examine the base material will come from a recordable indication as a result from an examination required by Table 2500-1; either a general visual or a VT-3. If an indication is recorded that requires supplemental examination to evaluate

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-3
VT PRIOR TO PAINT OR COATING REMOVAL**

the base material, an additional VT-3 exam prior to coating removal provides no additional information to the base material condition until after the paint or coating is removed. Relief is requested in accordance with 10 CFR 50.55a(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.

ALTERNATE EXAMINATION:

Since a visual exam prior to paint or coating removal provides no additional information as to the condition of the base metal, no additional alternative exam is proposed. A general visual exam from Table 2500-1 is an acceptable exam to record a degraded paint or coating without the need to conduct an additional VT-3 prior to coating removal for base metal evaluation. Successive exams will be conducted in accordance with IWE-2420(b) and (c) as required for the base metal.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-4
VT- 2 AFTER REPAIR, REPLACEMENT, OR MODIFICATION**

COMPONENT:

All Class MC components subject to IWE-5000 system pressure testing visual examination.

EXAM AREA:

System pressure test boundary following repair, modification or replacement.

IWE COMPONENT DRAWING:

PBC-300 through 312

ASME SECTION XI CATEGORY:

Examination Category E-P, Table IWE-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

E9.10, E9.20, E9.30, and E9.40

ASME SECTION XI CODE REQUIREMENTS:

Paragraph IWE-5240 of ASME Section XI, 1992 Edition with the 1992 Addenda, requires that the requirements of IWA-5240 for visual examination, VT-2, are applicable following repair, replacement or modification.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested from performing the VT-2 visual examination in connection with system pressure testing following repair, replacement or modification.

BASIS FOR RELIEF:

Paragraph IWE-5210 states that except as noted within paragraph IWE-5240 the requirements of IWA-5000 are not applicable to Class MC or Class CC components. Paragraph IWE-5240 states that the requirements of Paragraph IWA-5240 (corrected from IWA-5246 to IWA-5240 in the 1993 Addenda) for visual examination are applicable. Paragraph IWA-5240 identifies a VT-2 visual exam to detect evidence of leakage from pressure retaining components. Personnel performing a VT-2 must meet qualifications in accordance with IWA-2300 of ASME Section XI.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-4
VT- 2 AFTER REPAIR, REPLACEMENT, OR MODIFICATION**

Nondestructive examinations and acceptance criteria stated in the original construction code must be met for repairs, replacements or modifications that are performed under ASME Section XI. This provides additional assurances that the repairs, replacements or modifications are sound and leak-tight.

Table IWE-2500-1, Examination Category E-P, identifies the examination method of 10 CFR 50, Appendix J and does not specify a VT-2 visual examination. The Appendix J testing method is performed with calibrated instrumentation and provides adequate testing and acceptance criteria to ensure the repair, replacement or modification will meet the design safety function of the Class MC component. A VT-2 visual examination will not provide additional assurance of safety beyond that of the current Appendix J testing program.

Relief is requested in accordance with 10 CFR 50.55a(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. Pressure testing in accordance with 10 CFR 50 Appendix J, provides an adequate level of quality and safety.

ALTERNATE EXAMINATION(S):

Testing shall be conducted in accordance with 10 CFR 50 Appendix J as required in Paragraph IWE-5221, provides an adequate level of quality and safety without the need for applying Paragraph IWE-5240 of ASME Section XI. No alternate examination is proposed.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-5
SUCCESSIVE EXAMINATIONS AFTER REPAIR**

COMPONENT:

All repaired Class MC Components or Items, Paragraphs IWE-2420(b) and IWE-2420(c): Code successive examination requirements for components found acceptable for continued service.

EXAM AREA:

Applicable to all repaired MC Components and Items

IWE COMPONENT DRAWING:

PBC-300 through 312

ASME SECTION XI CODE REQUIREMENT:

Paragraphs IWE-2420(b) and IWE-2420(c) of the 1992 Edition, 1992 Addenda of ASME Section XI Code requires that when component examination results require evaluation of flaws, evaluation areas of degradation, or repairs in accordance with Article IWE-3000, and the component is found to be acceptable for continued service, the areas containing such flaws, degradation, or repairs shall be reexamined in accordance with the augmented examinations of Examination Category E-C, during the next two inspection periods (3 consecutive inspection periods) listed in the schedule of Inspection Program "B" of Paragraph IWE-2412, in accordance with Table IWE-2500-1, Examination Category E-C.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested from performing successive examinations after a repair in accordance with Paragraphs IWE-2420(b) and IWE-2420(c).

BASIS FOR RELIEF:

The purpose of a repair is to restore the component to an acceptable condition for continued service in accordance with the acceptance standards of Article IWE-3000. Paragraph IWA-4150 requires the owner to conduct an evaluation of the suitability of the repair including consideration of the cause of failure.

If the repair has restored the component to an acceptable condition, successive examinations are not warranted. If the repair was not suitable, then the repair does not meet Code requirements and the component is not acceptable for continued service. Neither Paragraph IWB-2420(b), Paragraph IWC-2420(b), nor Paragraph IWD-2420(b) requires a repair to be subject to

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-5
SUCCESSIVE EXAMINATIONS AFTER REPAIR**

successive examination requirements. If the repair area is subject to accelerated degradation, it would still require augmented examination in accordance with Table IWE-2500-1, Examination Category E-C.

SECY-96-080 Comment 3.3, was resolved as follows, "The purpose of IWE-2420(b) is to manage components found to be acceptable for continued service (meaning no repair or replacement at this time) as an Examination Category E-C component. If the component had been repaired or replaced, then more frequent examination would not be required."

As stated in the NRC/NEI meeting notes dtd. 1/13/98, Item 7, "The staff believes that the successive examinations are required to monitor the flaws or degradations accepted by evaluation (and not by repair). For repaired flaws evaluated and accepted by the requirements of IWA-4000, the staff does not believe that successive examinations are necessary.

Successive exams in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) are not required for repairs made in accordance with Article IWA-4000 in ASME Section XI, 1998 Edition.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(ii). The successive examination of repairs in accordance with Paragraphs IWE-2420(b) and IWE-2420(c) constitutes a burden without a compensating increase in quality or safety.

ALTERNATE EXAMINATION:

Repaired flaws of Class MC Components or Items shall be evaluated and accepted in accordance with IWA-4000 without performing successive examinations in accordance with IWE-2420(b) and IWE-2420(c). Since a suitable Code repair provides adequate level of quality and safety, no alternate examination is proposed.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-6
BOLT TORQUE OR TENSION TESTING**

COMPONENT:

Pressure Retaining Bolting

EXAM AREA:

Bolts, studs, nuts, bushings, washers and threads in base material

IWE COMPONENT DRAWING:

PBC-302, 304 and 305

ASME SECTION XI CATEGORY:

Examination Category E-G, Table IWE-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

E8.20

ASME SECTION XI CODE REQUIREMENTS:

ASME Section XI, 1992 Edition with the 1992 Addenda, Table IWE-2500-1, Examination Category E-G, Pressure Retaining Bolting, Item 8.20 requires that pressure retaining bolted connections that have not been disassembled during the interval shall be subjected to a torque/tension test once each interval to assure leak-tight integrity.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested from Item 8.20 to perform a bolt torque or tension test on pressure retaining bolted connections that have not been disassembled during the inspection interval.

BASIS FOR RELIEF:

Performing a torque or tension test once each interval requires the bolted connection to be loosened and then re-torqued or re-tensioned. This would be considered a maintenance activity and would require both a pre-maintenance and post maintenance Appendix J test under Option B. Once a bolt is torqued or tensioned, it is not subject to dynamic loading that could cause it to

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-6
BOLT TORQUE OR TENSION TESTING**

experience a significant change. An Appendix J test ensures the pressure retaining bolting torque or tension has not changed significantly to have affected its leak-tight integrity. NRC/NEI meeting notes from H. Asher to G. Bagchi dtd. 1/13/98, Item 8, recognizes surveillance requirements for "pressure unseating bolted connections" as follows: "For the pressure unseating bolted connections, it is necessary to confirm that the bolt's pretension is maintained. If their adequacy is verified during Appendix J testing, or during routine disassembling and reassembling, the staff believes that additional torque testing as per Table IWE-2500 Item E8.20 is not needed."

Torque or tension testing is not required in any other ASME Section XI Class 1,2 or 3 bolted connections or their supports as part of Subsections IWB, IWC or IWD. Torque or tension testing for Class MC components is not included in ASME Section XI, 1998 Edition. All pressure retaining bolted connections for PBNP design are routinely tested under the 10CFR50 Appendix J, Option B testing program. The Appendix J testing is adequate to demonstrate that the leak-tight or structural integrity is met.

Relief is requested in accordance with 10 CFR 50.55a(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. Examination Category E-G, Pressure Retaining Bolting, is not included in ASME Section XI, 1998 Edition. Testing the bolted connections in accordance with 10 CFR 50, Appendix J Option B will provide adequate assurance of the leak-tight and structural integrity.

ALTERNATE EXAMINATION(S):

All bolted connections meet the pressure test requirements of Table IWE-2500-1, Examination Category E-P, All Pressure Retaining Components, Items E9.30 and E9.40 requiring 10 CFR 50 Appendix J testing. No alternate exam is proposed for Item 8.20 since 10CFR50 Appendix J testing provides adequate quality and safety.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-7
VENTING LEAK CHASE CHANNELS**

COMPONENT:

Leak Chase Channel System

EXAM AREA:

Leak Chase Channel System test plugs

IWE COMPONENT DRAWING:

PBC-300 through 312

ASME SECTION XI CATEGORY:

Examination Category E-P, Table IWE-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

E9.10

ASME SECTION XI CODE REQUIREMENT:

Table IWE-2500-1, Examination Category E-P, Note 2: If leak chase channels are utilized, they shall be unplugged or tested in accordance with 10 CFR 50, Appendix J, Type B test.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Performing 10 CFR 50, Appendix J. Type "B" test on Leak Chase Channels.

BASIS FOR RELIEF:

In accordance with NRC SER dated September 18, 1989 (Docket nos. 50-266 and 50-301), the venting of the containment liner leak chase channels during a containment integrated leak rate test is not required. All containment leak chase channels are plugged with test connections removed. Relief is requested in accordance with 10 CFR 50.55a(a)(3)(ii). To unplug and test all leak chase channels would constitute a burden without a compensating increase in quality or safety. The leak chase channels are accepted as the containment boundary.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-7
VENTING LEAK CHASE CHANNELS**

ALTERNATE EXAMINATION:

No additional examinations are proposed. The Type "A" leak testing currently being performed in accordance with 10 CFR 50 Appendix J provides adequate assurance that the leak-tight integrity of the containment vessel is maintained. Leak chase channels are plugged and visually inspected as part of the containment pressure boundary.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-8
INSPECTION PERIODS**

COMPONENT:

Containment Vessel

EXAM AREA:

Pressure retaining accessible containment surfaces

IWE COMPONENT DRAWING:

PBC-300 through 312

ASME SECTION XI CATEGORY:

Examination Category E-A, Table IWE-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

E1.12

ASME SECTION XI CODE REQUIREMENT:

Table IWE-2500-1, Item No. E1.12, requires (100%) of IWE Components or Items examined during the end of the 10 year inspection Interval.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Request relief from performing 100% of IWE VT-3 examinations at the end of the Inspection Interval.

BASIS FOR RELIEF:

In accordance with NEI/NRC Containment Inspection Requirements dated May 30, 1997, the response to Question 12 states the baseline examination for the inspection of IWE Components or Items shall be the inservice inspections required during the first inspection period (extended implementation period) of the first 10-Year Interval. Although allowed by ASME Section Code Table 2500-1, deferral of inservice inspections will not meet the intent of this NRC expectation.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-8
INSPECTION PERIODS**

Specifically the NRC expectation indicates “ Since the first period examination, performed within the five year expedited schedule, will serve as the “preservice inspection,” the deferrals of examinations, though permitted by Subsection IWE, are not acceptable during the first period examination”.

In addition, a related topic was also discussed in SECY-93-328, Enclosure 6, Discussion of Justification as a Safety Enhancement, Page 5, Implementation of Initial Inservice Inspection: ..“Utility inservice inspection specialists estimate 8000 hours of technicians’ (e.g., NDE examiner, Level II technician) time for the required Subsection IWE inservice inspection (ISI) of the containment each ten year ISI interval. For the purposes of this analysis, the staff has assumed that (75%) (6000 hours) of this inspection effort will occur at the end of each 10 year inspection interval, and the remaining 25% (2000 hours) will be distributed every three years corresponding to the approximate 3 year cycle for Appendix J Type A inspections.” ASME Section XI Code, Table IWE-2412-1, for Inspection Program B establishes the minimum and maximum examinations that can be completed and credited during the first, second and third Inspection Period. Specifically, during the 1st Inspection Period a minimum of 16% of examinations must be completed; the second Inspection Period a minimum of 50% of examinations must be completed and naturally at the end of the Inspection Interval or third Inspection Period, 100% of examinations must be completed.

Establishing a schedule for performing (100%) of the IWE Component or Item examinations at the end of the 10 year Inspection Interval would result in extreme hardship. Availability of qualified NDE inspectors; accessibility and scheduling IWE inspections around “critical path items”; performing engineering evaluations and additional hours associated with maintenance, health physics and engineering support personnel within a very short time span would be required to support the IWE examination effort. Requiring IWE examinations to be performed on a 30-year old plant at the end of the 10 year interval is unrealistic.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(ii) from the “100 % End of Interval” IWE examinations required by ASME Section XI Code, Table IWE-2500-1, Examination Category E-A, Item No. E1.12. The requirement constitutes a burden without a compensating increase in quality or safety.

ALTERNATE EXAMINATION:

Perform IWE Examination Category E-A, Item No. E1.12 examinations in accordance with Table IWE-2412-1, Inspection Program B. The Preservice examinations to be completed the first Inspection Period during the program implementation period ending September 2001.

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-9
NDE PERSONNEL QUALIFICATION AND CERTIFICATION**

COMPONENT:

All Class MC and CC pressure retaining components and associated seals, gaskets, and moisture barriers subject to examination in accordance with Subsections IWE and IWL of the 1992 Edition, 1992 Addenda.

EXAM AREA:

Pressure retaining accessible containment surfaces

COMPONENT DRAWINGS:

PBC-300 through 312, and PBC-333 through 342

ASME SECTION XI CATEGORY:

Examination Category for Table IWE-2500-1 and IWL-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

All IWE and IWL item numbers applicable to the program plan.

ASME SECTION XI CODE REQUIREMENT:

Subarticle IWA-2300, requires qualification of nondestructive examination personnel to CP-189, as amended by the ASME Section XI.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested from the provisions of Subarticle IWA-2300, "Qualification of Nondestructive Examination Personnel." This subarticle requires NDE personnel to be qualified and certified using a written practice in accordance with ANSI/ANST CP-189, "Standard for Qualification and Certification of Nondestructive Testing Personnel", 1991 Edition as amended by the requirements of this Division.

BASIS FOR RELIEF:

10 CFR 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

**CONTAINMENT INSPECTION RELIEF REQUEST
ERR-9
NDE PERSONNEL QUALIFICATION AND CERTIFICATION**

written practice based on the requirements of CP-189, as amended by the requirements of the Subarticle IWA-2300, to implement Subsections IWE and IWL duplicates the efforts already in place for all other subsections. 10 CFR 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, "American Society for Nondestructive Testing", 1984 Edition as amended by the requirements of IWA-2300. Further, Subarticle IWA-2300 of the 1992 Edition, 1992 Addenda states, "Certification based on SNT-TC-1A are valid until recertification 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. Administration of two written practices would not enhance safety or quality and would result in a burden of training, tracking certifications, and duplication of paperwork. This duplication would also apply to NDE vendor programs. Updating to the 1992 Edition, 1992 Addenda for Subsection IWB, IWC, etc., would require a similar request for relief.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(ii) for the written practice to be prepared in accordance with SNT-TC-1A, 1984 instead of ANSI/ANST CP-189, 1991. 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.

ALTERNATE EXAMINATION:

Examinations required by Subsections IWE and IWL shall be conducted by personnel qualified and certified to a written practice based upon SNT-TC-1A to the current Section XI Code of record for Subsections IWB, IWC, etc. The requirements of Subsection IWA-2300, based on the current Section XI Code of record for Subsections IWB, IWC, etc, shall apply including VT-1C and VT-3C requirements, as specified in Paragraph IWL-2310(c) of the 1992 Edition, 1992 Addenda of ASME Section XI.

**CONTAINMENT INSPECTION RELIEF REQUEST
LRR-1
REMOTE VT OF CLASS CC**

COMPONENT:

Containment Vessel

EXAM AREA:

Class CC Containment surfaces

IWL COMPONENT DRAWING:

PBC-333 through 342

ASME SECTION XI CATEGORY:

Examination Category L-A, Table IWL-2500-1, ASME Section XI Code, 1992 Edition, 1992 Addenda

ASME SECTION XI ITEM NUMBER:

L1.11 and L1.12

ASME SECTION XI CODE REQUIREMENT:

IWL-2310, Visual Examination and Personnel Qualification and IWA-2210, Visual Examinations, require specific minimum illumination and maximum direct examination distance for all concrete surfaces.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED:

Relief is requested for Paragraph IWA-2210, Visual Examination Requirements for minimum illumination and maximum direct examination distance of Class CC components under Paragraph IWL-2310.

BASIS FOR RELIEF:

10 CFR 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. In addition to the requirements of Subsection IWL, the rulemaking imposed the requirements of Subsection IWA of the 1992 Edition, 1992 Addendum, of ASME Section XI for minimum illumination and

**CONTAINMENT INSPECTION RELIEF REQUEST
LRR-1
REMOTE VT OF CLASS CC**

maximum direct examination distance of Class CC components, specifically for the examination of concrete under IWL-2510.

Accessibility to higher portions of the containment building make it a hardship to obtain the maximum direct examination distance and minimum illumination requirements. The installation of extensive temporary scaffold systems or a climbing scaffold system to access these portions of the containment would be necessary. These scaffolds would provide limited access due to containment geometry restrictions as well as structural and equipment interferences. The installation and removal of these scaffolds would increase both worker radiation exposure and personnel safety in order to meet Paragraph IWA-2210 requirements.

The NRC staff received seven comments that were consolidated into Public Comment # 2.3 in Part III of Attachment 6A to SECY-96-080. The Staff response to these concerns is as follows, "Comments received from ASME members on the containment committees indicate that the newer, more stringent requirements of IWA-2210 were not intended to be used for the examination of containments and were inadvertently included in Subsection IWL. The NRC agrees that remote examinations are the only practical method for inspecting much of the containment surface area. § 50.55a(b) (2) (x) (B) has been added to the final rule which contains alternative lighting and resolution requirements which may be used in lieu of the requirements contained in IWA-2210-1."

However, as specified within § 50.55a(b) (2) (x) (B) of the final rule, this alternative applies only to Subsection IWE.

Relief is requested in accordance with 10 CFR 50.55a(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.

ALTERNATE EXAMINATION:

When performing remotely the visual examinations required by Subsection IWL, Paragraph IWL-2510, the maximum direct examination distance specified in Table IWA-2210-1 may be extended, and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the conditions or indications for which the visual examination is performed can be detected at the chosen distance and illumination.