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December 1, 2000  
NMP1L 1559

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

RE:	<u>Nine Mile Point Unit 1</u> <u>Docket No. 50-220</u> <u>DPR-63</u>	<u>Nine Mile Point Unit 2</u> <u>Docket No. 50-410</u> <u>NPF-69</u>
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Subject: ***Inservice Inspection Relief Requests  
TAC No.'s MA9803 (Unit 1) and MA9804 (Unit 2)***

Gentlemen:

By this letter Niagara Mohawk Power Corporation (NMPC) is withdrawing from consideration three (3) Performance Demonstration Initiative (PDI) inservice inspection (ISI) relief requests that were submitted for NRC review by letter dated August 31, 2000. These relief requests, ISI-15, ISI-19 and ISI-20 are being withdrawn per NMPC's conference call with the NRC.

Additionally, pursuant to 10 CFR 50.55a(a)(3)(i), 10 CFR 50.55a(a)(3)(ii) and 10 CFR 50.55a(g)(6)(i), NMPC is resubmitting two (2) ISI relief requests for NRC approval. These relief requests, ISI-16 and ISI-17, supersede the previously submitted ISI-16 and ISI-17 relief requests in their entirety. These relief requests are common to Nine Mile Point Unit 1 and Nine Mile Point Unit 2 (NMP1 and NMP2) and provide supplemental information requested by the NRC.

The attached relief requests relate to the NRC's Final Rule amending 10 CFR 50.55a, as published in the Federal Register on September 22, 1999 (64 FR 51370). This rulemaking requires NMPC to implement Appendix VIII titled, "Performance Demonstration for Ultrasonic Examination Systems," to the American Society of Mechanical Engineers (ASME) Section XI, Division 1, 1995 Edition with the 1996 Addenda, with modifications as stated in 10 CFR 50.55a(b)(2)(xiv, xv and xvi), on an expedited basis.

The attached relief requests have been prepared using the revised guidance from the Electric Power Research Institute and PDI, and their discussions with the NRC.

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The Final Rule specifies an implementation date of May 22, 2000, for Supplements 1, 2, 3 and 8 of Appendix VIII. NMPC has revised the applicable Ultrasonic Testing examination procedures to comply with the 1995 Edition, 1996 Addenda of ASME Section XI as they pertain to Appendix VIII and PDI. Refueling Outage 16 (RFO16) for NMP1 is currently scheduled to start in March 2001. Inservice inspections per Supplements 1, 2, 3 or 8 pursuant to the Final Rule will be performed during RFO16 as described in the attached relief requests. Therefore, NRC approval of the attached relief requests is requested by March 1, 2001.

This letter supercedes our previous submittal dated October 26, 2000 (NMP1L 1547), pertaining to the same subject. NMP1L 1547 was inadvertently submitted without the attachments (revised relief requests ISI-16 and ISI-17). This current submittal, while not modifying the information initially contained in NMP1L 1547, has been made to formally transmit relief requests ISI-16 and ISI-17.

Sincerely,



Richard B. Abbott  
Vice President Nuclear Engineering

RBA/JJD/cld  
Attachments

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

## **ATTACHMENTS**

**NINE MILE POINT UNIT 1/2  
INSERVICE INSPECTION INTERVAL  
RELIEF REQUEST ISI-16**

**A. COMPONENT IDENTIFICATION**

System: Various

Class: Quality Group A and B, ASME Code Class 1 and 2

Component Description: All components subject to ultrasonic examination in accordance with Appendix VIII to the 1995 Edition with 1996 Addenda of ASME Section XI.

**B. ASME SECTION XI EXAMINATION REQUIREMENTS**

10 CFR 50.55a(g)(6)(ii)(C) requires the expedited implementation of the ASME Code, Section XI, 1995 Edition through 1996 Addenda, of Appendix VIII, ultrasonic examinations. The Supplements to Appendix VIII requires implementation in accordance with the following schedule:

<b>IMPLEMENTATION SCHEDULE</b>		
SUPPLEMENT	QUALIFICATION REQUIREMENTS	IMPLEMENTATION DATE
1	Evaluating Electronic Characteristics of Ultrasonic Systems	May 22, 2000
2	Wrought Austenitic Piping Welds	May 22, 2000
3	Ferritic Piping Welds	May 22, 2000
4	Clad/Basemetal Interface of Reactor Vessel	November 22, 2000
5	Nozzle Inside Radius Section	November 22, 2002
6	Reactor Vessel Welds other than Clad/Basemetal Interface	November 22, 2000
7	Nozzle-to-Vessel Welds	November 22, 2002
8	Bolts and Studs	May 22, 2000
9	Cast Austenitic Piping (in course of preparation)	N/A
10	Dissimilar Metal Welds	November 22, 2002
11	Full Structural Overlaid Wrought Austenitic Piping Welds	November 22, 2001
12	Coordinated Implementation of Selected Aspects of Supplement 2, 3,10, and 11	November 22, 2002
13	Coordinated Implementation of Selected Aspects of Supplement 4, 5, 6, and 7	November 22, 2002

ASME Section XI, Division 1, 1995 Edition with Addenda through 1996 requires qualification of Nondestructive Examination (NDE) personnel to CP-189, 1991 Edition, and the additional requirements of Sub-article IWA-2300, same Edition and Addenda.

The 1989 Edition of ASME Section XI, requires qualification of Nondestructive Examination (NDE) personnel to ASNT SNT-TC-1A, 1984 Edition, and the additional requirements of sub-article IWA-2300, including Appendix I, of the same Edition.

**C. RELIEF REQUESTED**

Pursuant to 10 CFR 50.55a(a)(3)(i), NMPC requests relief to continue basing all requirements for initial certification and recertification of ultrasonic examination personnel on the 1989 Edition of Section XI. This includes use of ASNT SNT-TC-1A, 1984 as amended by IWA-2300 and Appendix VII of Section XI, 1989 Edition,

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until August 1, 2001.

**D. BASIS FOR RELIEF**

10 CFR 50.55a was amended in the Federal Register (Volume 64, No. 183 dated September 22, 1999, 64 FR 51370) to require the use of the 1995 Edition, with the 1996 Addenda of ASME Section XI, with an expedited implementation schedule for Appendix VIII qualification requirements. This amendment also imposes the requirements of Article IWA-2300 and Appendix VII of the 1995 Edition, with 1996 Addenda of Section XI.

Sub-article IWA-2300 of Section XI requires a written practice be prepared in accordance with CP-189, 1991 Edition, as amended by the requirements of IWA-2300 of Section XI. Paragraph IWA-2310 stated that current certifications based on SNT-TC-1A are not affected and are valid until recertification is required.

This mandate would require NMPC to develop, implement, and to the extent possible, consolidate a multifaceted written practice, specific to ultrasonic examination personnel, to address the various requirements contained in SNT-TC-1A and CP-189, as amended by different Editions and Addenda of ASME Section XI, including IWA-2300 and Appendix VII. The requirements would be phased in as identified in the above implementation schedule.

Compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Regardless of whether CP-189 or ASNT SNT-TC-1A is the base document used to develop the written practice, all personnel conducting ultrasonic examinations to Appendix VIII requirements must be qualified in accordance with Appendix VIII and all personnel qualified through the PDI program must be qualified in accordance with Appendix VII.

Additionally, for non-Appendix VIII ultrasonic examinations, all NDE examiners, (regardless of the examination method) will continue to be certified in accordance with a written practice developed in accordance with ASNT SNT-TC-1A and the additional requirements of IWA-2300 of the applicable ASME Section XI Edition and/or Addenda as identified in the current inservice inspection program for the specific inservice inspection interval.

Note: IWE/IWL personnel qualification and certification requirements were addressed separately under Request for Relief RR-IWE/IWL-1.

A comparison of the implementation requirements for Appendix VIII examinations using the 1984 Edition of SNT-TC-1A as modified by IWA-2300 and Appendix VII of the 1989 Edition of Section XI with the 1991 Edition of CP-189 as modified by IWA-2300 and Appendix VII of the 1995 Edition and 1996 Addenda of Section XI is considered to be unwieldy and subjective because of their myriad differences.

Therefore, three less complex comparisons of technically significant items are attached. Attachment 1 compares IWA-2300 from the 1995 Edition with the 1996 Addenda to the 1989 Edition. Attachment 2 compares Appendix VII of the 1995 Edition with the 1996 Addenda to the 1989 Edition. Attachment 3 compares the 1991 Edition of CP-189 with the 1984 Edition of SNT-TC-1A as modified by Appendix VII.

As written, there are major differences between CP-189 and SNT-TC-1A. However, as illustrated in the attached comparisons, these are minimized by the moderating effects of the applicable IWA-2300 requirements and especially the Appendix VII requirements.

In lieu of maintaining redundant, possibly conflicting programs, the proposed alternative for qualifications of ultrasonic examination personnel will simplify record keeping, satisfy the need to maintain personnel qualifications, eliminate redundant systems, and provide an acceptable level of quality and safety commensurate with the other NDE disciplines.

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**E. ALTERNATIVE EXAMINATIONS**

NMPC proposes to continue basing all requirements for initial certification and recertification of ultrasonic examination personnel on the 1989 Edition of Section XI. This will include the use of ASNT SNT-TC-1A, 1984 Edition, as amended by IWA-2300 and Appendix VII of Section XI, 1989 Edition.

Personnel performing ultrasonic examinations shall also meet the requirements specified in 10 CFR 50.55a as amended by Federal Register 64 FR 51370 which sets forth the requirements for the qualification of ultrasonic NDE Level I, II and III personnel by demonstration.

This combination of a written practice based on ASNT SNT-TC-1A and a performance based demonstration for personnel performing ultrasonic examinations of welds or components will continue to ensure the structural integrity of systems/components.

**F. IMPLEMENTATION SCHEDULE**

NMPC has committed to update the qualification and certification program to CP-189 by August 1, 2001 for the following:

Third Ten-Year Inservice Inspection Interval for Unit 1, December 26, 1999 through December 25, 2009  
Second Ten-Year Inservice Inspection Interval for Unit 2, April 5, 1998 through April 4, 2008

**G. ATTACHMENTS**

- Attachment 1 - Comparison of the qualification and certification requirements of ultrasonic examiners certified to CP-189, 1991, and SNT-TC-1A, 1984, as modified by IWA-2300 and Appendix VII of 1989 Edition and 1995/1996 Edition/Addenda of Section XI, respectively.
- Attachment 2 - Comparison of the qualification and certification requirements of ultrasonic examiners certified to Appendix VII of 95/96 and 1989 Edition of Section XI, respectively .
- Attachment 3 - Comparison of the qualification and certification requirements of ultrasonic examiners certified to CP-189, 1991 and SNT-TC-1A as modified by Appendix VII, 1989 Edition.

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**ATTACHMENT 1**

**COMPARISON OF THE QUALIFICATION AND CERTIFICATION REQUIREMENTS OF  
ULTRASONIC EXAMINERS CERTIFIED TO CP-189, 1991, AND SNT-TC-1A, 1984, AS  
MODIFIED BY IWA-2300 AND APPENDIX VII OF 1989 EDITION AND 1995/1996 EDITION/ADDENDA OF  
SECTION XI, RESPECTIVELY**

The following is a summary of pertinent technical aspects of the implementation requirements contained in Sub-paragraph IWA-2300 to the two Editions of ASME Section XI identified below.

The comparison is complicated because some of the requirements may be modified or omitted, simply because they are defined in another location or by another document. Several requirements, such as those for limited certification, differ somewhat but the differences are not considered technically relevant and they are not detailed in this technical comparison. These complications are representative of the increased burden when administering more than one program or a program based on varying requirements.

<u>1995 Ed with 1996 Add of Section XI</u>	<u>1989 Edition of Section XI</u>
IWA-2310 – Written practice is prepared using ANSI/ASNT "Standard" CP-189, 1991 Edition. Certifications based on SNT-TC-1A remain valid until recertification.	IWA-2310 – Written practice is prepared using ASNT "Recommended Practice" SNT-TC-1A, 1984 Edition. Certifications based on earlier editions remain valid until recertification.
IWA-2311 – The written practice shall specify the duties and responsibilities of the Principle Level III.	Not Addressed
IWA-2312 – NDE methods listed in CP-1989 – Similar to 1989 IWA-2311	IWA-2311 – NDE methods listed in SNT-TC-1A – Similar to 95/96 IWA 2312
IWA-2313 – NDE methods not listed in CP-189 – Similar to 1989 IWA-2312	IWA-2312 – NDE methods not listed in SNT-TC-1A – Similar to 1989 IWA-2313
IWA-2314 – Level I and II recertified every 3 years, Level III every 5 years by examination per CP-189. ASNT Level III not required	IWA-2313 – Level I and II recertified every 3 years, Level III every 5 years by examination per SNT-TC-1A.
IWA-2321 – Snellen 20/25 using lower case letters with a known pre-measured height (see IWA-2322). Administered in accordance with a procedure, and by personnel, approved by an NDE Level III designated by the employer.	IWA-2321- Jaeger number 1 or equivalent, conducted by personnel qualified to conduct the examinations.
IWA-2322 – Requires use of 10x magnifier to measure height of letters.	Not Addressed
IWA-2323 – Level III qualifications evaluated by Basic, Method, Specific, and Practical examinations and the Demonstration examination (Level II Practical).	IWA-2322 – Level III qualifications determined by Basic, Method, and Specific examinations per SNT-TC-1A. (Demonstration examination would be required by Section XI, Appendix VIII).
CP-189 General, Specific and Practical examinations administered and graded by a Level III.	IWA-2323 – Level I and II qualifications determined by General and Specific examinations, and a Practical hands-on examination administered by a Level III.
95/96 Appendix VII is similar to 1989 Appendix VII (See detailed comparison following).	IWA-2324 – Defines requirements for administration of examinations. This is Modified by Appendix VII.
IWA-2330 – Level I responsibilities. Identical to 1989 IWA-2330	IWA-2330 – Level I responsibilities. Identical to 95/96 IWA-2330
IWA-2340 – Level III education. Similar to 1989 IWA-2340	IWA-2340 – Level III education. Similar to 95/96 IWA-2340
IWA-2350 – Defines limited certification. Provides more definition than 1989.	IWA-2350 – Defines limited certification requirements.
IWA-2360 – Allows certification directly to Level II. Defines additional Level III responsibilities.	Appendix VII allows certification directly to Level II. Defines similar Level III responsibilities.
IWA-2370 – Contains experience requirements for Level II candidates.	1989 Appendix VII contains requirements that are more stringent.

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**ATTACHMENT 2**

**COMPARISON OF THE QUALIFICATION AND CERTIFICATION REQUIREMENTS OF  
ULTRASONIC EXAMINERS CERTIFIED TO APPENDIX VII 95/96 AND 1989 EDITION OF  
SECTION XI, RESPECTIVELY**

The following is a summary of pertinent technical aspects of the implementation requirements contained in Subparagraph IWA-2300 to the two Editions of ASME Section XI identified below.

The comparison is complicated because some of the requirements may be modified or omitted, simply because they are defined in another location or by another document. These complications are representative of the increased burden when administering more than one program or a program based on varying requirements.

95/96 APPENDIX VII	1989 APPENDIX VII
VII-1000 – Scope – Modifies the requirements of IWA-2300 for Ultrasonic examiners	VII-1000 - identical to 95/96
VII-2000 – Qualification Levels – Identifies 5 qualification Levels as defined in CP-189	VII-2000 – essentially the same. Defines NDE Instructor qualification since it is not included in SNT-TC-1A.
VII-3000 – Written Practice – Defines the written practice, including the definition of an "outside agency" since it is not defined in CP-189.	VII-3000 Identical to 95/96 except "outside agency" is not defined, since it is included in SNT-TC-1A.
<b>VIII-4000 – Qualification Requirements</b>	
CP-189 contains no simultaneous experience provisions.	Table VII-4110-1 states the simultaneous experience provision of SNT-TC-1A is not applicable.
Paragraph VII-4223 requires previously qualified individuals to meet the requirements for training.	Both Appendices in paragraph VII-4300 state that to be considered for examination the Level I, II, and III candidates shall have successfully completed the training required in VII-4200.
Paragraph VII-4240 states that no examination is required for the annual retraining.	Not Addressed
Paragraph VII-4310 (a) states that a random selection process must be controlled by the written practice so no individual takes the same examination more than once.	Not Addressed
Paragraph VII-4310 (b) allows the use of "grading units" to produce a specimen bank for the practical examination.	Not Addressed
Paragraph VII-4330 (a) Level III examinations per IWA-2300, Basic, Method, Specific, Practical, Demonstration, contains rules for Level II practical examination. An Appendix VIII practical is acceptable.	While the 1989 Appendix VIII contains no requirements for a practical examination, it would be required for the mandatory Appendix VIII.
Paragraph VII-4330 (b) allows recertification of Level III personnel using only the Method and Specific examinations.	IWA-2313 requires recertification using Basic, Method, and Specific written examinations.
Not addressed	VII-6000 – Defines duties of the ANII
VII Supplements	Essentially the same

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**ATTACHMENT 3**

**COMPARISON OF THE QUALIFICATION AND CERTIFICATION REQUIREMENTS OF  
ULTRASONIC EXAMINERS CERTIFIED TO CP-189, 1991 and SNT-TC-1A AS MODIFIED BY  
APPENDIX VII, 1989 EDITION**

Comparisons are not detailed in those areas where CP-189 is modified by the requirements of Appendix VII. Please note that the word "should" typically identifies what is considered a requirement in SNT-TC-1A, while CP-189 typically uses the word "shall". Industry practice is to treat SNT-TC-1A recommendations as requirements. Several paragraphs are identified as similar. This is subjective. For example, while SNT-TC-1A does not specifically require suspension of an examiners certification for a lapsed vision examination, as does CP-189, it is industry practice to do so.

CP-189	SNT-TC-1A
1.0 – Scope – CP-189 is a standard that establishes the minimum requirements.	1.0 – Scope – SNT-TC-1A is a recommended practice establishing guidelines.
2.0 – Definitions – More inclusive (19 terms) and more concise. Some Modified by Appendix VII.	2.0 – Definitions – Less inclusive (7 terms)
3.0 Level of Qualification	
3.1 – Classification	Modified by Appendix VII
3.2 – Level III	4.3 (3) – Similar to CP-189
3.3 – Level II	4.3 (2) – Similar to CP-189
3.4 – Level I	Modified by Appendix VII
3.5 – Trainee	4.2 – Similar to CP-189
3.6 – NDE Instructor	Modified by Appendix VII
4.0 Qualification Requirements	
4.1 – Training	Modified by Appendix VII
4.2 – Experience	Modified by Appendix VII
4.3 – Previous Training and Experience	Modified by Appendix VII
4.4 – NDT Instructor	Modified by Appendix VII
4.5 – Outside services	Modified by Appendix VII
5.0 – Qualification and Certification	
5.1 – Procedure	Modified by Appendix VII
5.2 – Procedure requirements	Modified by Appendix VII
5.3 – Approval – "written practice" approved by Level III	Modified by Appendix VII – Requires that "written practice" specify responsibilities.
6.0 Examinations	
6.1 – Vision	Modified by IWA-2300
6.2 – Level III Examination	Modified by Appendix VII
6.3 – Level I and II Examination	Modified by Appendix VII
6.4 – Administration and grading	Modified by Appendix VII
6.5 – Reexamination	Modified by Appendix VII
6.6 – Administration of Examinations – prohibits one's self or one's subordinate from preparing or administering an examination.	Not specifically addressed
7.0 Expiration, Suspension, Reinstatement of Employer Revocation, and Certification	
7.1 – Expiration	Similar to CP-189
7.2 – Suspension	Similar to CP-189
7.3 – Revocation	Similar to CP-189
7.4 – Reinstatement	Similar to CP-189
8.0 Employer Recertification	
8.1 – NDT Level I and II	Modified by Appendix VII
8.2 – NDT Level III	Modified by Appendix VII
9.0 Records	
9.1 – Responsibility for Documentation	Modified by Appendix VII
9.2 – Contents of Certification Record	Modified by Appendix VII

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RELIEF REQUEST ISI-17**

**A. COMPONENT IDENTIFICATION**

System: Reactor Pressure Vessel  
Class: Quality Group A, ASME Code Class 1  
Component Description: Pressure-Retaining Nozzle-to-Vessel welds

**B. ASME SECTION XI EXAMINATION REQUIREMENTS**

ASME Section XI, 1989 Edition, No Addenda, Table IWB-2500-1, Examination Category B-D, "Full Penetration Welds Of Nozzles in Vessels - Inspection Program B

Code Item Number	Parts Examined	Extent and Frequency
B3.90	Nozzle-to-Vessel Welds	Volumetric Examination of all welds per Figure IWB-2500-7 (a) and (b)

ASME Section V, 1989 Edition, Article 4, Paragraphs; T-441.3.2.5 Angle Beam Scanning, T-441.3.2.6 Scanning for Reflectors Oriented Parallel to the Weld, and T-441.3.2.7 Scanning for Reflectors Oriented Transverse to the Weld.

**C. RELIEF REQUESTED**

Pursuant to 10 CFR 50.55a (a)(3)(i), NMPC requests relief from the examination volume requirements of ASME Section XI Figures IWB-2500-7 (a) and IWB-2500-7 (b).

NMPC also requests relief from the ASME Section V, Article 4 for the performance of the required volumetric examinations as specified in Table IWB-2500-1 Category B-D of the 1989 Edition of ASME Section XI.

**D. BASIS FOR RELIEF**

NMPC is currently required to perform in-service examinations of selected welds in accordance with the requirements of 10 CFR 50.55a(g)(4) and (g)(5), and the 1989 Edition of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Rules for Inservice Inspection of Nuclear Power Plant Components. This Code Edition invokes the examination volume requirements of Figures IWB-2500-7 (a) and IWB-2500-7 (b). This Code Edition also invokes the examination requirements of Appendix I, Article I-2000 which reference ASME Section V, Article 4 that essentially prescribes a twenty (20) year old examination methodology.

The examination volume for the Reactor Vessel pressure retaining nozzle-to-vessel welds extends far beyond the weld into the base metal, and is unnecessarily large. This extends the examination time significantly, and results in no net increase in safety, as the area being examined is a base metal region which is not prone to inservice cracking and has been extensively examined before the vessel was put into service and during the First Inservice examination.

The implementation of this request for relief would reduce the examination volume next to the widest part of the weld from half of the vessel wall thickness to one-half (1/2) inch from the weld. This reduction is applicable to base metal examination volume that was extensively interrogated during the construction and preservice inspections and is not located in the high stressed areas of the nozzle-to-vessel weld. The high stressed areas are included in the examination volume as defined above and are subject to examination.

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Implementation of this request for relief is also expected to reduce on-vessel examination time, which translates to significant cost savings and reduced personnel radiation exposure.

**E. ALTERNATIVE EXAMINATIONS**

NMPC proposes to use the reduced volume of one-half (1/2") inch from the weld, in lieu of the requirements of ASME Section XI Figures IWB-2500-7 (a) and IWB-2500-7 (b).

NMPC also proposes to use the alternative requirements defined above, in lieu of the requirements of ASME Section V, Article 4 for the performance of the required volumetric examinations as specified in Table IWB-2500-1 Category B-D of the 1989 Edition of ASME Section XI.

NMPC will perform examinations in accordance with ASME Code, Section XI, Div. 1, 1995 Edition, 1996 Addenda, Appendix VIII Supplement VII as modified by the Code of Federal Regulations Title 10, Part 50, Section 50.55a(b)(2)(K)(3) utilizing a ultrasonic technique that has been qualified with the performance-based methodology.

The extent of examination coverage proposed along with the demonstrated ultrasonic technique and the periodic system pressure tests will provide added assurance that the Reactor Vessel welds have remained free of service related flaws, therefore, providing an acceptable level of quality and safety.

**F. IMPLEMENTATION SCHEDULE**

Third Ten-Year Inservice Inspection Interval for Unit 1  
Second Ten-Year Inservice Inspection Interval for Unit 2

**G. ATTACHMENT TO THE RELIEF:**

None