January 26, 2001

Mr. R. G. Lizotte
Master Process Owner - Assessment
c/o Mr. David A. Smith
Northeast Nuclear Energy Company
P. O. Box 128
Waterford, CT 06385-0128

SUBJECT: MILLSTONE NUCLEAR POWER STATION, UNIT NOS. 2 AND 3 - REQUEST FOR RELIEF (TAC NOS. MA9857 AND MA9858)

Dear Mr. Lizotte:

By letter dated August 25, 2000, and supplemented on November 8, 2000, Northeast Nuclear Energy Company (the licensee) requested relief from certain American Society of Mechanical Engineers Boiler and Pressure Vessel Code (Code) required inspection criteria. The licensee's proposed alternatives to the Code are contained in relief requests RR-89-30, RR-89-32, and RR-89-33 for the third 10-year inservice inspection (ISI) interval at Millstone Nuclear Power Station, Unit No. 2 and relief requests RI-2-15, RI-2-17, and RI-2-18 for the second 10-year ISI interval at Millstone Nuclear Power Station, Unit No. 3. Based on the safety evaluation (Enclosure 1), the staff found these requests for relief provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the staff authorizes the proposed alternatives. A summary of each relief request is contained in Enclosure 2.

This action completes the technical review for TAC Nos. MA9857 and MA9858. If you have any questions please contact Victor Nerses at (301) 415-1484.

Sincerely,

/RA/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-336 and 50-423

Enclosures: 1) Safety Evaluation
2) Summary of Relief Requests

cc w/encls: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION FOR

THIRD 10-YEAR INSERVICE INSPECTION INTERVAL AT

MILLSTONE NUCLEAR POWER STATION UNIT 2

RELIEF REQUEST NOS. RR-89-30, RR-89-32, AND RR-89-33

SECOND 10-YEAR INSERVICE INSPECTION INTERVAL AT

MILLSTONE NUCLEAR POWER STATION UNIT 3

RELIEF REQUEST NOS. IR-2-15, IR-2-17, AND IR-2-18 AND

NORTHEAST NUCLEAR ENERGY

DOCKET NUMBERS 50-336 AND 50-423

1.0 INTRODUCTION

The inservice inspection of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Class 1, Class 2, and Class 3 components will be performed in accordance with Section XI of the ASME Code and applicable edition and addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states in part that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if the licensee demonstrates that: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection (ISI) of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first ten-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The Code of record for Millstone Nuclear Power Station, Unit 2 - third 10-year ISI interval and Unit 3 - second 10-year ISI

interval is the 1989 Edition of Section XI of the ASME Boiler and Pressure Vessel Code. The 10-year intervals began December 26, 1996, for Unit 2 and April 23, 1999, for Unit 3.
The staff has reviewed the information submitted by Northeast Nuclear Energy Company (the licensee) by letter dated August 25, 2000, and supplemented November 8, 2000, requesting relief from certain Code-required inspection criteria. The licensee's proposed alternatives to the Code requirements are contained in relief requests RR-89-30, RR-89-32, and RR-89-33 for the third 10-year inservice inspection (ISI) interval at Millstone Nuclear Power Station, Unit 2, and relief requests RI-2-15, RI-2-17, and RI-2-18 for the second 10-year ISI interval at Millstone Nuclear Power Station, Unit 3. A summary of each relief request with the staff's disposition is contained in Enclosure 2.

2.0 RELIEF REQUEST NOS.: RR-89-30 (UNIT 2) AND IR-2-15 (UNIT 3), ULTRASONIC TESTING LENGTH (UT) SIZING TOLERANCE FOR REACTOR PRESSURE VESSEL PERFORMANCE DEMONSTRATIONS

2.1 Code Requirements for Which Relief is Requested

Section 50.55a(g)(6)(ii)(C) of title 10 of the *Code of Federal Regulations* imposes implementation of Appendix VIII to the 1995 Edition with 1996 Addenda of Section XI of the ASME Code. The imposed implementation schedule for Supplement 4 to Appendix VIII is November 22, 2000. Supplement 4, Subparagraph 3.2(b), length sizing qualification criterion requires that flaw lengths estimated by UT be the true length -¼ inch +1 inch. However, 10 CFR 50.55a(b)(2)(xv)(C)(1) modifies the length sizing qualification criterion to a depth sizing acceptance criterion of 0.15 inch root mean square (RMS) and specifies that this be used in lieu of the requirements of Subparagraph 3.2(b).

Supplement 4, Subparagraph 3.2(c), requires that the UT performance demonstration results be plotted on a two-dimensional plot with the measured depth plotted along the ordinate axis and the true depth plotted along the abscissa axis. For qualification, the plot must satisfy the following statistical parameters: (1) the slope of the linear regression line is not less than 0.7; (2) the mean deviation of flaw depth is less than 0.25 inches; and (3) the correlation coefficient is not less than 0.70.

2.2 Licensee's Proposed Alternative to ASME Code

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee proposed using a length sizing qualification criterion of 0.75 inch RMS in lieu of Appendix VIII, Supplement 4, Subparagraph 3.2(b), and to use the RMS values of 10 CFR 50.55a(b)(2)(xv)(C)(1) which modifies the depth sizing criterion of Appendix VIII, Supplement 4, Subparagraph 3.2(a), in lieu of Subparagraph 3.2(c).

2.3 Evaluation

The U.S. nuclear utilities created the Performance Demonstration Initiative (PDI) to implement performance demonstration requirements contained in Appendix VIII of Section XI of the ASME Code. To this end, PDI has developed a performance demonstration program for qualifying UT equipment, procedures, and personnel. During the development of the performance demonstration for Supplement 4, PDI determined that the Code criteria for flaw sizing was unworkable. The length sizing tolerance of - ¼ inch +1.0 inch in Supplement 4, Subparagraph 3.2(b) encouraged examiners to bias their results on the plus side. To discourage testmanship

(passing the test based on manipulation of results rather than skill), PDI adopted a length sizing tolerance of 0.75 inch RMS which has been in use since 1994. As early as 1995, the staff has recognized and accepted PDI's use of 0.75 inch RMS for length sizing. PDI formalized their use of 0.75 inch RMS as the criterion for Supplement 4, Subparagraph 3.2(b), in Code Case N-622, "Ultrasonic Examination of RPV and Piping and Bolts and Stubs, Section XI, Division 1." The NRC representatives to ASME Code meetings participated in the process leading up to the publishing of Code Case N-622.

The NRC staff intended to formalize the acceptability of the 0.75 inch RMS length sizing criterion in 10 CFR 50.55a(b)(xv)(C)(1), but mistakenly published the value of 0.15 inch RMS for depth sizing tolerance in place of the existing length sizing tolerance. The omission of the length sizing tolerance of 0.75 inch RMS in the rule was an oversight, and the inclusion of the depth sizing tolerance in Subparagraph 3.2(b) was an error. The NRC staff considers that the proposed alternative to use a length sizing tolerance of 0.75 inch RMS in lieu of the requirements in Supplement 4, Subparagraph 3.2(b) will provide an acceptable level of quality and safety.

In the second part of the alternative, the licensee proposed eliminating the use of Supplement 4, Subparagraph 3.2(c) which imposes three statistical parameters for depth sizing. The first parameter, 3.2(c)(1), pertains to the slope of a linear regression line. The linear regression line is the difference between actual versus true value plotted along a through-wall thickness. For Supplement 4 performance demonstrations, a linear regression line of the data is not applicable because the performance demonstrations are performed on test specimens with flaws located in the inner 15% through-wall. The differences between actual versus true value produce a tight grouping of results which resemble a shot gun pattern. The slope of a regression line from such data is extremely sensitive to small variations, thus making the parameter of Subparagraph 3.2(c)(1) a poor and inappropriate acceptance criterion. The second parameter, 3.2(c)(2), pertains to the mean deviation of flaw depth. The value used in the code is too lax with respect to evaluating flaw depths within the inner 15% of wall thickness. Therefore, the licensee proposed to use the more appropriate criterion of 0.15 inch RMS of 10 CFR 50.55a(b)(2)(xv)(C)(1), which modifies Subparagraph 3.2(a), as the acceptance criterion. The third parameter, 3.2(c)(3), pertains to a correlation coefficient. The value of the correlation coefficient in Subparagraph 3.2(c)(3) is inappropriate for this application since it is based on the linear regression from Subparagraph 3.2(c)(1).

PDI was aware of the inappropriateness of Subparagraph 3.2(c) early in the development of their program. They brought the issue before the appropriate ASME committee which formalized eliminating the use of Supplement 4, Subparagraph 3.2(c) in Code Case N-622. The NRC staff representatives participated in the discussions and consensus process of the code case. Based on the above, the NRC staff believes that the use of Subparagraph 3.2(c) requirements in this context is inappropriate and that the proposed alternative to use the RMS value of 10 CFR 50.55a(b)(2)(xv)(C)(1), which modifies the criterion of Appendix VIII, Supplement 4, Subparagraph 3.2(a), in lieu of Subparagraph 3.2(c), will provide an acceptable level of quality and safety[1].

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1. The information which would have been required for Appendix VIII, Supplement 4, Subparagraph 3.2(c)(1) is still required and valid for the sizing qualification of Appendix VIII, Supplement 6.

2.4 Conclusion

Based on the discussion above, the staff has concluded that the proposed alternatives RR-89-30 for the third 10-year ISI interval at Millstone, Unit 2, and IR-2-15 for the second ISI interval at Millstone, Unit 3, will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the staff authorizes these two proposed alternatives.

3.0 RELIEF REQUEST NOS.: RR-89-32 (UNIT 2) AND IR-2-17 (UNIT 3), SUBARTICLE VII-4240 SUPPLEMENTAL TRAINING FOR UT PERSONNEL

3.1 Code Requirements for which Relief is Requested

The licensee is requesting relief from the 1995 Edition with 1996 Addenda, Appendix VII to Section XI of the Code, Subarticle VII-4240 for Appendix VIII qualified UT personnel. Subarticle VII-4240 requires a minimum of 10 hours of annual UT training.

3.2 Licensee's Proposed Alternative to ASME Code

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee proposed conducting annual UT training for Appendix VIII qualified UT personnel, in accordance with 10 CFR 50.55a(b)(2)(xiv) requirements in lieu of Subarticle VII-4240 to Appendix VII of Section XI of the ASME Code.

3.3 Evaluation

Subarticle VII-4240, Appendix VII of Section XI of the ASME Code requires 10 hours of annual training to impart knowledge of new developments, material failure modes, and any pertinent technical topics as determined by the licensee. No hands-on training or practice is required to be included in the 10 hours of training. This training is required of all UT personnel qualified to perform examinations of ASME Code Class 1, 2, and 3 systems. Independent of the ASME Code, 10 CFR 50.55a(b)(2)(xiv) imposes the requirement that 8 hours of hands-on training with flawed specimens containing cracks be performed no earlier than 6 months prior to performing examinations at a licensee's facility. The licensee contends that maintaining two separate UT annual training programs create confusion, redundancies, and extra paper work.

As part of the staff's rulemaking effort to revise 10 CFR 50.55a(b)(2), the issue of UT annual training requirements was reviewed. This review was included in the summary of comments to the rule 64 *FR* 51370. In the review, the staff determined that the 10 hours of annual training requirement specified in the ASME Code was inadequate for two reasons. The first reason was that the training does not require practice with flawed specimens. Practice with flaws is necessary because signals can be difficult to interpret. The second reason is related to the length of training and its frequency. Studies have shown that an examiner's capability begins to diminish within 6 months if skills are not maintained. Therefore, examiners must practice on a frequent basis to maintain their capability for proper interpretation of flaws.

Based on resolution of public comments for the above rulemaking, the staff accepted an industry initiative advanced by the Electric Power Research Institute (EPRI), which proposed 8 hours of hands-on practice with flawed specimens containing cracks. The practice would occur no earlier than 6 months prior to performing examinations at a licensee's facility. The initiative

was adopted in 10 CFR 50.55a(b)(2)(xiv) for personnel maintaining their Appendix VIII qualifications. The staff believes that the proposed alternative to use 10 CFR 50.55a(b)(2)(xiv) in lieu of Subarticle VII-4240 will maintain the skill and proficiency of UT personnel at or above the level provided in the Code for annual UT training, thereby, providing an acceptable level of quality and safety.

3.4 Conclusion

Based on the discussion above, the staff concludes that the proposed alternative RR-89-32 for the third 10-year ISI interval at Millstone, Unit 2 ,and IR-2-17 for the second ISI interval at Millstone, Unit 3, will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the staff authorizes these two proposed alternatives.

4.0 RELIEF REQUEST NOS.: RR-89-33 (UNIT 2) AND IR-2-18 (UNIT 3), DELAY IMPLEMENTATION OF CP-189

4.1 Code Requirements for which Relief is Requested

The regulations in 10 CFR 50.55a(g)(6)(ii)(C) imposes implementation of Appendix VIII to the 1995 Edition with 1996 Addenda of Section XI of the ASME Code. The implementation schedules for the Supplements to Appendix VIII are: May 22, 2000 for Supplements 1, 2, 3, and 8; November 22, 2000, for Supplements 4 and 6; November 22, 2001 for Supplement 11; and November 22, 2002 for Supplement 5, 7, 10, 12, and 13. Appendix VIII references Appendix VII which references Subarticle IWA-2300 of Section XI of the 1995 Edition with 1996 Addenda of the ASME Code. Subarticle IWA-2310 requires qualification of nondestructive (NDE) examiners according to the 1991 Edition of CP-189 as amended by the requirements of Division 1 of the ASME Code.

Subarticle IWA-2300 to Section XI of the 1989 Edition of the Code requires qualification of NDE examiners outside the scope of Appendix VIII be conducted according to SNT-TC-1A, 1984 Edition and the additional requirements of Division 1, including Appendix I to Section XI of the ASME Code.

4.2 Licensee's Proposed Alternative to ASME Code

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee's proposed alternative is to continue initial certification and re-certification of UT personnel in accordance with the requirements contained in the 1989 Edition of Section XI of the ASME Code, through August 31, 2001. Personnel performing UT examinations shall also meet the requirements specified in 10 CFR 50.55a(b)(xv) for the qualification of personnel by demonstration. The combination of a written practice based on SNT-TC-1A and a performance-based demonstration for personnel performing UT examination of welds or components will ensure the structural integrity of the system/components.

4.3 Evaluation

The staff performed a detailed comparison of SNT-TC-1A and CP-189. CP-189 contains essentially everything that is in SNT-TC-1A and some additional requirements. CP-189 has a

larger definition of terms which are applicable to performance demonstrations than SNT-TC-1A. CP-189 requires written procedures detailing the program for qualifying and certifying UT personnel. CP-189 requires Level III personnel to answer more questions in the method specific examination (questions on specifications, equipment, techniques, and procedures) and to pass a performance demonstration.

Except for Level III examiners, the changes from SNT-TC-1A to CP-189 are mostly programmatic and do not affect UT personnel skills. The CP-189 requirement that Level III examiners demonstrate proficiency in UT is addressed by the licensee in the submittal. The licensee committed UT Level III personnel performing Appendix VIII examinations to demonstrate their proficiency with a UT performance demonstration, thereby, satisfying the demonstration criterion in CP-189.

The ASME Code has provided for an orderly transition from SNT-TC-1A to CP-189 with the continued recognition of certifications until re-certification is required. For Level I and II examinations, re-certification is every three years, and for Level III examiners, re-certification is every five years. The orderly transition provided for in the ASME Code does not consider licensee-specific difficulties. The licensee is requesting a delay in implementing CP-189 to accommodate a planned refueling outage scheduled for February 2001. The delay would provide the licensee with an opportunity to perform an orderly transition to CP-189 after the outage. The licensee will implement CP-189 by August 1, 2001. The programmatic differences between SNT-TC-1A and CP-189 should not affect the proficiency of UT personnel over the short time that this relief is being requested. Therefore, the staff concludes that the proposed alternative would provide an acceptable level of quality and safety.

4.4 Conclusion

Based on the discussion above, the staff concludes that the proposed alternative RR-89-33 for the third 10-year ISI interval at Millstone, Unit 2 ,and IR-2-18 for the second ISI interval at Millstone, Unit 3, will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the staff authorizes these two proposed alternatives until August 1, 2001.

5.0 CONCLUSION

Based on the evaluation above, the staff found these requests for relief (RR-89-30, RR-89-32, and RR-89-3 for Millstone, Unit 2 and RI-2-15, RI-2-17, and RI-2-18 for Millstone, Unit 3) provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the staff authorizes these proposed alternatives.

Principal Contributor: Donald Naujock

Date: January 26, 2001

MILLSTONE NUCLEAR POWER STATION, UNIT NOS. 2 AND 3
Second and Third 10-Year ISI Interval
(Enclosure 2)

SUMMARY OF RELIEF REQUESTS

Relief Request Number	System or Component	Exam Category	Item No.	Volume or Area to be Examined	Required Method	Licensee Proposed Alternative	Relief Request Status
RR-89-30 IR-2-15	Reactor Pressure Vessel	B-A	B1.10 B1.20	Longitudinal and Circumferential Shell Welds Head Welds Subject to Appendix VIII, Supplement 4, Examination	Length sizing qualification criteria -1/4 inch +1 inch	Length sizing qualification criteria to be 0.75 inch RMS	Authorized 10CFR50.55a(3)(i)
RR-89-32 IR-2-17	Components Subject to UT	Subarticle VII-4240	NA	Components Subject to UT	10 hours of annual training	8 hours of hands on training no earlier than 6 months prior to performing UT	Authorized 10CFR50.55a(3)(i)
RR-89-33 IR-2-18	Qualification of Examination Personnel	95E/96A Section XI IWA-2300	NA	Components Subject to UT with Appendix VIII.	Use of CP-189	Use ASNT SNT-TC-1A until August 1, 2001	Authorized 10CFR50.55a(3)(i)

Millstone Nuclear Power Station
Units 2 and 3

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