



Richard B. Abbott
Vice President
Nuclear Engineering

Phone: 315.349.1812
Fax: 315.349.4417

December 15, 2000
NMP2L 2004

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

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Subject: *Inservice Inspection Relief Request RR-ISI-19, TAC No. MB0585*

Gentlemen:

Pursuant to 10 CFR 50.55a(a)(3)(i), Niagara Mohawk Power Corporation (NMPC) is submitting Relief Request RR-ISI-19 (attached) for Nuclear Regulatory Commission (NRC) review and approval for Nine Mile Point Unit 2 (NMP2). The relief request proposes to utilize American Society of Mechanical Engineers Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000, Section XI, Division 1." NMPC included a similar request for relief (ISI-8) in the Nine Mile Point Unit 1 (NMP1) Third Ten-Year Interval Inservice Inspection Program Plan that was submitted on October 30, 1999. The NRC approved NMP1 Relief Request ISI-8 in their safety evaluation dated October 5, 2000.

To support inservice inspection (ISI) activities commencing in the second period of the second ten-year ISI interval, NMPC requests that the NRC approve the attached relief request by June 1, 2001, and that such relief be authorized until such time that Code Case N-532 is referenced in a future revision of 10 CFR 50.55a.

Very truly yours,

Richard B. Abbott
Vice President Nuclear Engineering

RBA/DEV/cld
Attachment

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

1047

**NINE MILE POINT UNIT 2
SECOND INSERVICE INSPECTION INTERVAL
RELIEF REQUEST
RR-ISI-19**

A. ARTICLE IDENTIFICATION:

Article IWA-4000	Repair Procedures
Article IWA-6000	Records and Reports
Article IWA-7000	Replacement

B. ARTICLE REQUIREMENTS:

IWA-4800 The records required by IWA-6000 shall be completed for all repairs.

IWA-7520(a)(8) Completed Owner's Report for Repairs or Replacements, Form NIS-2.

IWA-6210(c) The Owner shall prepare inservice inspection summary reports for Class 1 and 2 pressure retaining components and their supports.

IWA-6220(c) Inservice Inspection (ISI) summary reports shall be required at the completion of each inspection conducted during a refueling outage. Examinations, tests, replacements, and repairs conducted since the preceding summary report shall be included.

IWA-6220(d) Each summary report shall contain the following:

(2) Owner's Report for Inservice Inspection, Form NIS-1.

(3) Owner's Report for Repair or Replacement, Form NIS-2.

IWA-6230 Within 90 days of the completion of the inservice inspection conducted during each refueling outage, the Owner shall file ISI Summary Reports with the enforcement and regulatory authorities.

C. RELIEF REQUESTED:

Pursuant to 10 CFR 50.55a(a)(3)(i), Niagara Mohawk Power Corporation (NMPC) requests Relief from the following:

1. Preparation of the Owner's Report for Inservice Inspection, Form NIS-1.
2. Preparation of the Owner's Report for Repair or Replacement, Form NIS-2.
3. Submittal of the summary report within 90 days following completion of the inservice inspection conducted during each refueling outage.

D. BASIS FOR RELIEF:

It is NMPC's conclusion that the summary report required by IWA-6000 does not contain the information necessary to assure compliance with Code requirements, and therefore does not provide a compensating increase in the quality and/or safety at Nine Mile Point Unit 2.

The summary report does not furnish evidence of compliance with the ASME Boiler and Pressure Vessel Code, Section XI, Inspection Program B, percentage requirements as mandated by IWB-2412, IWC-2412, and IWD-2412.

Class 3 components are excluded from the summary report submittal.

**NINE MILE POINT UNIT 2
SECOND INSERVICE INSPECTION INTERVAL
RELIEF REQUEST
RR-ISI-19**

Both a final report and summary report must be prepared, reviewed and approved in order to comply with Sub-articles IWA-6220 and IWA-6310, respectively.

The preparation, review, approval and certification of each record and report, within the time frame of 90 days following completion of each refueling outage, increases substantially the costs associated with inservice inspection activities, and puts an unreasonable time constraint on NMPC without an increase in assurance of Code compliance.

Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000, Section XI Division 1", has not been published in Regulatory Guide 1.147, dated May 1999 "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1"; however, the USNRC staff has approved it's use at other nuclear stations.

The information provided in the documentation pertaining to the use of Code Case N-532 can be used in the same manner to assess the safety implications of Code activities performed during the outage. A review using the information as prescribed by the Code Case will, therefore, provide the same or improved level of quality and safety as reviews that may be conducted using the Code reporting requirements.

E. ALTERNATIVE EXAMINATIONS OR TESTS:

As an alternate to the requirements of IWA-4000, IWA-6000, and IWA-7000, NMPC will implement ASME Code Case N-532, "Alternative Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission as Required by IWA-4000 and IWA-6000", Section XI, Division 1", (Note: 1 -ASME 1992 Edition Section XI).

F. IMPLEMENTATION SCHEDULE:

The alternate requirements of ASME Code Case N-532 will be incorporated into the NMP2 Inservice Inspection Program during the remainder of the 2nd Ten-Year Interval, consisting of the second and third periods and all subsequent intervals.