



Entergy Nuclear Generation Company  
Pilgrim Nuclear Power Station  
600 Rocky Hill Road  
Plymouth, MA 02360

J. F. Alexander  
Director  
Nuclear Assessment

10 CFR 50.55a(a)(3)(i)

ENG. Ltr. 2.01.008  
March 27, 2001

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

Docket No. 50-293  
License No. DPR-35

Pilgrim Relief Request (PRR)-26  
Relief from the Inspection Percentage Requirements under 1989 ASME Code, Articles IWB-2412 and  
Table IWB-2412-1 for Refueling Outage 13

Reference: "Pilgrim Risk-Informed Inservice Inspection Program", ENG. Letter No. 2.00.084, dated December 27, 2000.

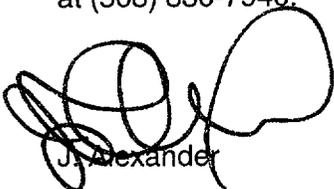
This letter requests NRC approval of the attached Pilgrim Relief Request (PRR) No. 26, in support of refueling outage (RFO)-13. RFO - 13 is scheduled to begin on April 21, 2001.

This relief request is submitted in accordance with 10 CFR 50.55a(a)(3)(i) and applies to the minimum and maximum percentages of inspection requirements specified in the 1989 ASME Code, Article IWB-2412 and Table IWB-2412-1 for Class 1 code category B-J and B-F piping welds. This relief request is based upon the Pilgrim Risk-Informed Inservice Inspection Program, which was submitted for NRC review and approval on December 27, 2000. The attachment provides PRR-26 for your review and approval.

PRR-26 follows the NRC Information Notice 98-44 guidance and the proposed alternative provided therein provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i).

NRC has previously approved a similar relief request (based upon the proposed alternative discussed in the Pilgrim PRR-26) for Nine Mile Point Nuclear Station (Docket Number 50-410, TAC No. MA6470 dated December 14, 1999).

If you have any questions regarding the information contained in this letter, please contact Walter Lobo at (508) 830-7940.



J. F. Alexander

Attachment: Pilgrim Relief Request No. 26

A047

CC: Mr. Alan B. Wang, Project Manager  
Project Directorate I-3  
Office of Nuclear Reactor Regulation  
Mail Stop: OWFN 8F2  
U. S. Nuclear Regulatory Commission  
1 White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

U.S. NRC, Region 1  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector  
Pilgrim Nuclear Power Station

Pilgrim Station 3<sup>rd</sup> Interval  
Inservice Inspection Plan

**RELIEF REQUEST NUMBER PRR-26**

**REVISION 0**

(Page 1 of 2)

**SYSTEM/COMPONENT(S) FOR WHICH RELIEF IS REQUESTED:**

ASME B&PV Code, Section XI, 1989 Edition, Division 1, Examination Categories B-F and B-J.

This relief request excludes the augmented examination program of Generic Letter 88-01, NRC position on IGSCC in BWR austenitic stainless steel piping for Category C, D, and E welds, and NRC Bulletin 88-08, "Thermal Stresses in Piping Connected to the Reactor Coolant Systems".

**CODE REQUIREMENT(S):**

IWB-2412 requires that examinations completed within an inspection period meet minimum and maximum percentages as defined in Table IWB-2412-1.

**REQUIREMENT(S) FROM WHICH RELIEF IS REQUESTED:**

Relief is requested from meeting the minimum percentages in Table IWB-2412-1 for Code Category B-F and B-J welds for the second period (i.e., 50% examinations completed), while the approval process for the recently submitted Risk-Informed Inservice Inspection (RI-ISI) program for Pilgrim Station is completed.

**BASIS FOR RELIEF:**

Implementation of previous RI-ISI programs have been shown to reduce risk (or maintain risk neutrality) while substantially reducing worker exposure and undue burden. Because RI-ISI programs focus inspections (and inspection methods) on locations potentially susceptible to degradation, while considering the consequence of piping failure, a more robust targeted inspection program can be defined.

This relief will eliminate performance of piping examinations that may no longer be required once the RI-ISI methodology is in place.

NRC Information Notice 98-44, "Ten-Year Inservice Inspection Program Update for Licensees that Intend to Implement RI-ISI of Piping," states that the probabilistic risk assessment technology in NRC regulatory activities should be increased to the extent supported by state of the art methods and data and in a manner that complements the NRC's deterministic approach. Basically, this information combined with risk assessment techniques and associated data provides for the development of an effective approach to the ISI program, which provides an acceptable level of quality and safety, as required by 10 CFR 50. 55a(a)(3)(i).

Accordingly, Pilgrim RI-ISI program was submitted to NRC on December 27, 2000 for review and approval (Docket number 50-293). The RI-ISI program submitted by Pilgrim Station was developed in accordance with the "Safety Evaluation Report Related To Revised Risk-Informed Inservice Inspection Evaluation Procedure" (EPRI Topical Report TR-112657, Rev. B, July 1999). Additionally, the submitted program was prepared in a manner consistent with the guidance in ASME Code Case N-578 as applied to Class 1 piping.

Pilgrim Station 3<sup>rd</sup> Interval  
Inservice Inspection Plan

**RELIEF REQUEST NUMBER PRR-26**

**REVISION 0**

(Page 2 of 2)

This relief request allows Pilgrim to vary from the prescribed Code Category B-F and B-J percentages based on the original population of components as submitted in the currently approved ASME Section XI ISI program plan. Upon approval of the recently submitted RI-ISI program, Pilgrim will complete 100% of the RI-ISI program by July 2009.

**ALTERNATIVE EXAMINATION(S):**

In accordance with 10 CFR 50.55a(a)(3)(i), Pilgrim proposes an alternative to the ASME Code examination requirements for Code Category B-F and B-J welds. This alternative consists of the following:

Pilgrim will either complete 100% of the RI-ISI program as approved by July 2009 or will complete the remainder of the ASME Section XI ISI program by July 2005. ISI program interval start and end dates for the two programs are concurrent and are not altered by this relief request.

Except as noted above, Pilgrim will continue augmented inspection programs, inspections required for flaws dispositioned by analysis, system pressure tests, and inspection of components other than piping in accordance with current commitments.

**IMPLEMENTATION SCHEDULE:**

Pilgrim Station has completed 34% of the traditional ASME, Section XI required ISI examinations during the first period of the current third ISI interval, which began on July 1, 1995.

Refuel Outage 13, currently scheduled to begin on April 21, 2001, is the only outage scheduled during the second period. Pilgrim will schedule the implementation of the RI-ISI program upon NRC approval, such that, 66% of the welds selected for the RI-ISI program will be completed by the end of the current inspection interval in July 2005.

For subsequent inspection intervals, 100% of the RI-ISI inspections will be completed.