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10 CFR 50.55a

April 11, 2001
2130-01-20063

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

Subject: Oyster Creek Generating Station (OCGS)
Docket No. 50-219
Facility License No. DPR-16
Relief Request No. 26

AmerGen Energy Company, LLC (AmerGen) requests relief from one of the requirements contained in ASME Section XI. This relief concerning Code Case N-546 is requested pursuant to 10 CFR 50.55(a)(3)(i). AmerGen requests approval of the enclosed relief request by April 1, 2002 to support performance of required leakage inspections prior to the end of the current 10-year inservice inspection interval in October 2002.

Should you have any questions or require any additional information please contact Mr. George B. Rombold at 610-765-5516.

Very truly yours,



Ron J. DeGregorio
Vice President
Oyster Creek

Enclosure: ISI Relief Request No. 26

c: H. J. Miller, Administrator, USNRC Region I
L. A. Dudes, USNRC Senior Resident Inspector, Oyster Creek
H. N. Pastis, USNRC Senior Project Manager, Oyster Creek
File No. 01042

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**Oyster Creek Generating Station
Relief Request No. 26
Regarding ASME Code Case No. N-546**

COMPONENT IDENTIFICATION

Code Class: Class 1, Class 2, and Class 3

Reference: ASME Section XI, 1986 Edition, IWA -2300

Examination Categories: Not Applicable

Item Number: Not Applicable

Description: Alternative Requirements for Qualification of VT-2 Examination Personnel

Component Numbers: Class 1, Class 2, and Class 3 Pressure Retaining Components

CODE REQUIREMENTS

ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 1986 Edition, Subarticle IWA-2300, requires that personnel performing VT-2 and VT-3 visual examinations be qualified in accordance with comparable levels of competency as defined in ANSI N45.2.6. Additionally, the examination personnel shall have natural or corrected near distance vision acuity, in at least one eye equivalent to a Snellen fraction of 20/20. For far vision, personnel shall have natural or corrected far distance visual acuity of 20/30 or equivalent.

CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

AmerGen requests to implement Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel," which is not yet approved by the NRC in 10 CFR 50.55a.

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative provides an acceptable level of quality and safety. Section XI currently requires personnel conducting VT-2 inspections to be qualified and certified to comparable levels of qualifications as defined in SNT-TC-1A and the Employer's written practice. However, unlike the nondestructive testing methods addressed within SNT-TC-1A, or VT-1 and VT-3 examination

methods, VT-2 examinations do not require a special knowledge of underlying technical principals to perform the examination. It is a straightforward examination to look for evidence of leakage or structural distress. No special skills or technical training are required in order to observe water dripping from a component or bubbles forming on a wetted joint. As such, VT-2 personnel need not be subjected to the same qualification and certification requirements that were established for nondestructive testing personnel. Code Case N-546 provides appropriate requirements for the qualification and certification of VT-2 examination personnel. Code Case N-546 requires that personnel performing VT-2 visual inspections have at least forty (40) hours of plant walkdown experience, receive a minimum of four (4) hours of training on Section XI requirements, and pass the vision test requirements of IWA-2300, 1986 Edition. This alternative to existing Code requirements reduces the administrative burden on maintaining a Section XI certification program for VT-2 examiners. This allows the use of personnel most familiar with walkdowns of plant systems, such as licensed and non-licensed operators, local leak rate test personnel, system engineers and examination personnel. The qualification of VT-2 examinations will be maintained by using the alternative qualification criteria in the Code Case N-546.

PROPOSED ALTERNATIVE PROVISIONS

AmerGen will use the provisions of Code Case N-546 at Oyster Creek in its entirety as an alternative to the requirements of Section XI, IWA-2300 for qualifying licensed and non-licensed operators, local leak rate test personnel, system engineers, and nondestructive examination personnel. Oyster Creek has formal inspection procedures so that consistent VT-2 visual examinations are performed. The hours of experience, training and testing of all personnel selected as qualified VT-2 examiners will be documented and maintained. Use of Code Case N-546 will provide a comparable level of quality and safety to that currently in place for VT-2 visual examinations.

PERIOD FOR WHICH RELIEF IS REQUESTED

This relief request is for Oyster Creek's third inspection interval, scheduled to end October 2002.