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10 CFR 50.55a

RS-01-090

April 27, 2001

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555 - 0001

Braidwood Station, Units 1 and 2  
Facility Operating License Nos. NPF-72 and NPF-77  
NRC Docket Nos. STN 50-456 and STN 50-457

Subject: Braidwood Station Interval 2 Inservice Inspection Program: Relief Request I2R-35, Alternative Requirements for Qualification of VT-2 Examination Personnel, Revision 1

Reference: Letter from T. J. Tulon (Exelon Generation Company, LLC) to U.S. NRC, "Braidwood Station Interval 2 Inservice Inspection Program: Relief Request I2R-35, Alternative Requirements for Qualification of VT-2 Examination Personnel," dated July 5, 2000

In accordance with 10 CFR 50.55a(a)(3)(i), "Codes and Standards," we are providing a revision to the Inservice Inspection Program Relief Request I2R35 for a proposed alternative to the requirements of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (B&PV) Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," which was submitted in the Reference letter.

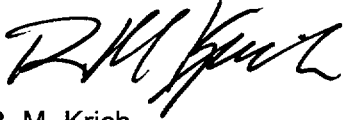
Relief Request I2R-35 proposed to use ASME Code Case N-546 qualification requirements for personnel performing VT-2 examinations to detect evidence of leakage from pressure retaining components during inservice inspections. In a teleconference on December 19, 2000, the NRC requested additional requirements to the proposed qualification program, including a provision to qualify VT-2 personnel by examination and to recertify personnel by examination every three years. Exelon Generation Company, LLC, Braidwood Station, agrees to these additional provisions and has incorporated them in the attached revision to the Inservice Inspection Program Relief Request I2R35.

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Should you have any questions concerning this letter, please contact Ms. Kelly M. Root at (630) 663-7292.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. M. Krich', written in a cursive style.

R. M. Krich  
Director - Licensing  
Mid-West Regional Operating Group

Attachment: Braidwood Station Interval 2 Inservice Inspection Program: Relief Request  
I2R-35, Alternative Requirements for Qualification of VT-2 Examination  
Personnel, Revision 1

cc: Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - Braidwood Station  
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

**RELIEF REQUEST: I2R-35**  
**REVISION 1**  
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**COMPONENT IDENTIFICATION**

Code Class:	1, 2, and 3
Reference:	IWA-2300
Examination Category:	N/A
Item Number:	N/A
Description:	Alternative Requirements for Qualification of VT-2 Examination Personnel.
Component Numbers:	Class 1, 2, and 3 Pressure Retaining Components.

**CODE REQUIREMENTS**

Section XI, Subarticle IWA-2300 and Paragraph IWA-2312 require personnel performing nondestructive examinations not listed in SNT-TC-1A to be qualified and certified to a comparable level of qualification as defined in SNT-TC-1A and the Employer's written practice.

**BASIS FOR RELIEF**

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis the proposed alternatives would provide an acceptable level of quality and safety.

Section XI currently requires personnel conducting VT-2 examinations to be qualified and certified to comparable levels of qualification 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 examination does not require any special knowledge of technical principals underlying its performance. It is only the straight forward examination for leakage. No special skills or technical training are required in order to observe water dripping from a component or bubbles forming on a joint wetted with leak detection solution. As such, VT-2 personnel should not be subject to the same qualification and certification requirements that were established for nondestructive testing personnel. Code Case N-546 provides more applicable requirements for the qualification and certification of VT-2 inspection personnel.

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**REVISION 0**  
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**BASIS FOR RELIEF** (Cont.)

Code Case N-546 requires that personnel performing VT-2 visual examinations 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-2321, 1995 Edition. This alternative to the existing Code requirements reduces the administrative burden of maintaining a Section XI qualification and certification program for VT-2 examiners and allows for the use of personnel most familiar with the walkdown of plant systems, such as licensed and nonlicensed operators, local leak rate personnel, system engineers, and NDE personnel to perform VT-2 visual inspections. The quality of VT-2 visual examinations will be maintained by using the alternate qualification rules approved by ASME in Code Case N-546.

Code Case N-546 was approved by the ASME Boiler and Pressure Vessel Code Committee on August 24, 1995, but is not yet included in the most recent listing of NRC approved code cases provided in Revision 12 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1".

**PROPOSED ALTERNATE PROVISIONS**

Braidwood Station will use the provisions of Code Case N-546 as alternatives to the requirements of Section XI, IWA-2300 for qualifying VT-2 visual inspectors.

- VT-2 visual inspectors will have at least 40 hours plant walkdown experience, such as that gained by licensed and non- licensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel,
- At least 4 hours of training on Section XI requirements and plant specific procedures for VT-2 visual examination, and
- Vision test requirements of IWA-2321, 1995 Edition of ASME Section XI.

Braidwood Station will add the following provisions to the qualification of VT-2 personnel.

- VT-2 personnel will be qualified by examination on Section XI requirements and plant specific procedures, and
- Personnel will be requalified by examination every three (3) years.

In addition, all VT-2 examinations are performed using a common VT-2 procedure ensuring consistent, quality examinations and all results are independently reviewed by a Braidwood Station Level III as well as the Authorized Nuclear Inservice Inspector.

**APPLICABLE TIME PERIOD**

Relief is requested for the second ten-year interval of the Inservice Inspection Program for Braidwood Units 1 and 2.