

ENERGY NORTHWEST

P.O. Box 968 ■ Richland, Washington 99352-0968

November 2, 2001
GO2-01-149

Docket No. 50-397

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

Gentlemen:

Subject: **COLUMBIA GENERATING STATION, OPERATING LICENSE NPF-21
INSERVICE INSPECTION PROGRAM PLAN RELIEF REQUEST
2ISI-25**

This letter submits relief request 2ISI-25 to the Columbia Generating Station Inservice Inspection (ISI) Program Plan for the second inspection interval. This relief request addresses the purchase, exchange, and transfer of materials between nuclear electric generating facilities. NRC authorization is being requested, in accordance with 10 CFR 50.55a(a)(3)(i), to allow the use of ASME Section XI Code Case N-528-1 in lieu of the ASME Section III Code administrative requirements imposed by IWA-7210. Please refer to the attachment for details.

Review and approval is requested prior to December 1, 2002.

If you have any question or desire additional information pertaining to this letter, please call Bob Sherman at (509) 377-8616.

Respectfully,



RL Webring
Vice President, Operations Support/PIO
Mail Drop PE08

Attachment

cc: EW Merschoff – NRC RIV
JS Cushing – NRC NRR
NRC Senior Resident Inspector – 988C

TC Poindexter – Winston and Strawn
DL Williams – BPA/1399

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RELIEF REQUEST 2ISI-25

Requirements for Which Relief is Requested

This request for relief proposes an alternative to the requirements of IWA-7000 when material that meets the IWA-9000 definition of "material" is purchased, exchanged, or transferred between nuclear plant sites.

Section XI Code Requirement

Article IWA-7000 of the 1989 Edition of ASME Section XI contains the requirements for Code applicability of replacement items.

Code Requirement from Which Relief is Requested

Relief is requested from the requirements of IWA-7210 when material meeting the definition of "material" in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites.

Basis for Relief

Code Case N-528-1 provides an alternative to the administrative requirements of Section III imposed by IWA-7210. Energy Northwest has reviewed the code case and has determined its implementation will substantially reduce non-beneficial work activities required by IWA-7000.

Alternate Examination

Energy Northwest will comply with the requirements of Code Case N-528-1 in lieu of IWA-7210 when material that meets the IWA-9000 definition of "material" is purchased, exchanged, or transferred between nuclear plant sites. A copy of N-528-1 is provided as page 3 of this attachment.

Justification for Granting Relief

The ASME Code Committee evaluated the proposed alternatives contained in Code Case N-528-1 and determined that they are acceptable for replacement activities involving material meeting the definition of IWA-9000. The code case requires that the material was originally procured in compliance with ASME Code, Section III requirements, maintained in conformance with an approved Appendix B program, and not subject to any operation that might affect the mechanical properties of the material. The implementation of Code Case N-528-1 will not affect the level of quality and safety nor decrease the margin of public health

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and safety. While the cost savings associated with Code Case N-528-1 have not been quantified as a Cost Beneficial Licensing Action item, its implementation is consistent with the intent to eliminate non-beneficial work activities and their associated costs. Therefore, it is requested that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).

Implementation Schedule

Once approved this request for relief is to be effective for the second ISI inspection interval.

Bibliography

1. Boiler and Pressure Vessel Code section XI, 1989 Edition, no Addenda.
2. Letter dated October 18, 2000, J.B. Beasley, Jr. (Southern Nuclear Operating Company, Inc.) to USNRC Document Control Desk, "Vogtle Electric Generating Plant Requests for Relief – Second Ten-Year Inservice Inspection Program"
3. Letter dated June 5, 2001, Leonard N Olshan (NRC) to Mr. J.B. Beasley, Jr. (Southern Nuclear Operating Company, Inc.), "Vogtle Electric Generating Plant, Units 1 and 2 Re: Relief Requests for Second 10-Year Inservice Inspection (ISI) Interval (TAC Nos. MB0548 and MB0549)

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: May 7, 1999

*See Numeric Index for expiration
and any reaffirmation dates.*

Case N-528-1
Purchase, Exchange, or Transfer of Material
Between Nuclear Plant Sites
Section XI, Division 1

Inquiry: As an alternative to the administrative requirements of Section III¹ imposed by IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda), what requirements apply to Owners when material meeting the definition in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites provided the following requirements are met?

Reply: It is the opinion of the Committee that, as an alternative to the administrative requirements of Section III imposed by IWA-4220 (IWA-7210 in Editions and Addenda prior to the 1991 Addenda; IWA-4170 for the 1991 Addenda through the 1995 Edition, no Addenda), material meeting the definition in IWA-9000 may be purchased, exchanged, or transferred between nuclear plant sites, provided the following requirements are met:

(a) Materials shall have been furnished to the supplying plant in accordance with NA-3700/NCA-3800.

¹ Administrative requirements refer to possession of a Certificate of Authorization or Quality System Certificate (Materials).

(b) Since receipt by the supplying plant, the material was not placed in service, welded, brazed, nor subjected to any operation that might affect the mechanical properties of the material (e.g., heat treatment or forming).

(c) Documentation required by NA-3700/NCA-3800 shall be provided to the receiving plant with the material.

(d) When the material is fabricated in accordance with specific dimensional requirements in addition to those provided in a national standard (e.g., nonwelded valve bonnet or nonwelded pump casing), the evaluation of suitability required by IWA-4160 (IWA-7220 in Editions and Addenda prior to the 1991 Addenda; IWA-4150 for the 1991 Addenda through the 1995 Edition, no Addenda) shall include an evaluation of the material for its intended application, including any differences that might affect form, fit, or function.

(e) The receiving plant shall obtain certification for the following:

(1) The supplying plant purchased the material in accordance with NA-3700/NCA-3800 and maintained it in accordance with their Quality Assurance Program.

(2) Since receipt by the supplying plant, the material was not placed in service, welded, brazed, nor subjected to any operation that might affect the mechanical properties of the material (e.g., heat treatment or forming).

(f) Use of this Case shall be documented on the NIS-2 for repair or replacement using material obtained in accordance with the provisions of this Case.