

**Lewis Sumner**  
Vice President  
Hatch Project Support

**Southern Nuclear  
Operating Company, Inc.**  
40 Inverness Parkway  
Post Office Box 1295  
Birmingham, Alabama 35201  
  
Tel 205.992.7279  
Fax 205.992.0341



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Docket Nos. 50-321  
50-366

HL-6139

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

Edwin I. Hatch Nuclear Plant  
Third 10-Year Interval Inservice Inspection Program  
Submittal of Additional Requests for Relief

Ladies and Gentlemen:

This letter submits Request for Relief No. RR-MC-10 for the Third 10-Year Interval Inservice Inspection Program for the Edwin I. Hatch Nuclear Plant, Units 1 and 2. The attached request for relief proposes alternative examination in accordance with 10 CFR 50.55a(a)(3)(i). Relief is requested from performing the VT-2 visual examination in connection with system pressure testing following repair, replacement or modification under Article IWA-5000 of the 1992 Addenda to the 1992 Edition of the ASME Section XI Code. Request for Relief No. RR-MC-10 is provided in the Attachment.

Should you have any questions in this regard, please contact this office.

Respectfully submitted,

A handwritten signature in cursive script that reads "Lewis Sumner".

H. L. Sumner, Jr.

IFL/eb

Attachment: Request for Relief No. RR-MC-10.

cc: Southern Nuclear Operating Company  
Mr. P. H. Wells, Nuclear Plant General Manager  
SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. L. N. Olshan, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II  
Mr. L. A. Reyes, Regional Administrator  
Mr. J. T. Munday, Senior Resident Inspector - Hatch

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**Attachment**

Edwin I. Hatch Nuclear Plant  
Third 10-Year Interval Inservice Inspection Program

**Request for Relief No. RR-MC-10**

SOUTHERN NUCLEAR OPERATING COMPANY  
PLANT HATCH, UNIT 1 & 2  
THIRD 10-YEAR INTERVAL  
REQUEST FOR RELIEF NO. RR-MC-10

- I. System/Component(s) for Which Relief is Requested: All components subject to the rules and requirements for repair, replacement or modification of Class MC, IWE-5000 system pressure testing visual examination in accordance with the 1992 Edition, 1992 Addenda of ASME Section XI.
- II. Code Requirement: Paragraph IWE-5240 of the 1992 Edition, 1992 Addenda of ASME Section XI requires that the requirements of Paragraph IWA-5240 for visual examination, VT-2, are applicable following repair, replacement, or modification.
- III. Code Requirement for Which Relief is Requested: Relief is requested from performing the VT-2 visual examination in connection with system pressure testing following repair, replacement or modification under Article IWE-5000.
- IV. Basis for Relief: 10 CFR 50.55a was amended in the Federal Register (61FR41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. Paragraph IWE-5210 states that except as noted within Paragraph IWE-5240, the requirements of Article IWA-5000 are not applicable to Class MC or Class CC components. Paragraph IWE-5240 states that the requirements of Paragraph IWA-5240 (corrected from IWA-5246 to IWA-5240 in the 1993 Addenda) for visual examinations are applicable. Paragraph IWA-5240 identifies a "VT-2" visual examination. VT-2 examinations are conducted to detect evidence of leakage from pressure retaining components, with or without leakage collection systems, as required during the conduct of a system pressure test. In addition, personnel performing VT-2 examinations are required to be qualified in accordance with Subarticle IWA-2300 of ASME Section XI.

Table IWE-2500-1, Examination Category E-P, identifies the examination method of 10 CFR 50, Appendix J and does not specifically identify a VT-2 visual examination. 10 CFR 50, Appendix J provides requirements for testing as well as acceptable leakage criteria. These tests are performed by Appendix J "Test" personnel and utilize calibrated equipment to determine acceptability. Additionally, 10 CFR 50.55a(b)(2)(x)(E) requires a general visual examination of the containment each period that would identify any structural degradation that may contribute to leakage. A "VT-2" visual examination will not provide additional assurance of safety beyond that of current Appendix J practices.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). Pressure testing in accordance with 10 CFR 50, Appendix J, provides an adequate level of quality.

- V. Alternate Examinations: Testing shall be conducted in accordance with 10 CFR 50, Appendix J, in lieu of Paragraph IWE-5240 of ASME Section XI as well as performing an IWE detailed visual examination of the repaired or replaced area (VT-1).

SOUTHERN NUCLEAR OPERATING COMPANY  
PLANT HATCH, UNIT 1 & 2  
THIRD 10-YEAR INTERVAL  
REQUEST FOR RELIEF NO. RR-MC-10

- VI. Implementation Schedule: This relief request will be implemented in accordance with the expedited examination schedule for MC components as specified in 10CFR50.55a(g)(6)(ii)(B) during the Third Ten-Year ISI Interval.
- VII. Relief Request Status: Submitted to NRC for review and approval.