Draft

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STANDARD FORMAT FOR ASME CODE RELIEF REQUESTS FROM COMMERCIAL REACTOR LICENSEES

Purpose:

This White Paper provides guidance to licensees on preparing plant-specific American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code and ASME Operation and Maintenance (OM) Code relief requests for a commercial reactor pursuant to the inservice inspection or inservice testing requirements of 10CFR50.55a, "Codes and Standards".

Guidance is provided in determining the appropriate regulatory requirement under which relief may be approved by the NRC, and a standardized format that licensees may use on a voluntary basis to prepare a plant-specific relief request. This White Paper is intended to clearly delineate the regulatory requirements and assist licensees in preparing relief requests that contain the necessary supporting information in a consistent and complete manner, thereby reducing review time and associated fees in the NRC's processing of the requests.

This guidance describes the type and extent of information that is necessary in a relief request submittal for those items that cannot be fully inspected or tested in accordance with the ASME Code. Italicized information within brackets of the standard format represents licensee relief request-specific information that should be provided by the licensee.

Applicable Regulatory Requirements:

Depending on the situation, a licensee can use the following methods to seek NRC approval to deviate from regulatory requirements related to the ASME Code specified in 10CFR50.55a:

- Propose an *alternative* to the Code requirement and demonstrate:

- The *alternative provides an acceptable level of quality and safety* pursuant to 10CFR50.55a(a)(3)(i), or
- Complying with the *Code requirement would result in hardship or unusual difficulty without a compensating increase in quality or safety* pursuant to 10CFR50.55a(a)(3)(ii).

- Demonstrate the *Code requirement is impractical (not just inconvenient)* pursuant to 10CFR50.55a(f)(6)(i) for inservice testing items or 10CFR50.55a(g)(6)(i) for inservice inspection items.
- Propose using *later Code editions and addenda* pursuant to 10CFR50.55a(f)(4)(iv) for inservice testing items or 10CFR50.55a(g)(4)(iv) for inservice inspection items subject to the limitations and modifications listed in 10CFR50.55a(b). In order to use portions of Code editions or addenda, all related requirements of the respective editions or addenda must usually be met.
- Should a licensee determine it is *unable to examine more than 90 % of the examination volume of each reactor vessel shell weld* specified in 10CFR50.55a(g)(6)(ii)(A), an alternative must be proposed. The licensee is required to submit information to the NRC to support its determination, and must propose an alternative that would provide an acceptable level of quality and safety pursuant to 10CFR50.55a(g)(6)(ii)(A)(5) and 10CFR50.55a(a)(3)(i).
- When performing the augmented examination, a licensee may take credit for the ASME Code, Section XI reactor vessel examination already completed if it does the following:
  - First, perform the one-time augmented inspection specified in 10CFR50.55a(g)(6)(ii)(A)(2), and then
  - Submit a relief request pursuant to 10CFR50.55a(g)(5)(iii) based on the Code requirements being impractical.

A chart is included with this White Paper, as an aide in determining the appropriate type of relief request to prepare for submittal to the NRC. The chart cross-references relief request templates, included as an appendix to this White Paper, which can be used in preparing relief requests.

The ASME publishes a new edition of the Code every three years and new addenda are published every year. The latest editions and addenda that have been approved for use by the NRC are referenced in 10CFR50.55a(b). The ASME also publishes Code Cases that provide alternatives developed and approved by the ASME or explain the intent of existing Code requirements.

10CFR50.55a Footnote 6 states ASME Code Cases accepted in the following NRC Regulatory Guides[1] can be used by a licensee without additional NRC approval:

[1] On September 22, 1999, the NRC endorsed (64 FR 51370) the ASME Operation and Maintenance (O&M) Code that is replacing the ASME Code Section XI inservice testing requirements for nuclear power plant pumps and valves. With this endorsement, the NRC is developing a new regulatory guide for acceptance of ASME OM Code Cases (Draft Regulatory Guide DG-1089, "Operation and Maintenance Code Case Acceptability, ASME OM Code).

- Regulatory Guide 1.84, "Design and Code Case Acceptability – ASME Section III Division 1".
- Regulatory Guide 1.85, "Materials Code Case Acceptability – ASME Section III Division 1".
- Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability – ASME Section XI Division 1".

NRC approval to use other Code Cases can also be requested by a licensee pursuant to 10CFR50.55a(a)(3)(i) or 10CFR50.55a(a)(3)(ii). If authorized, the Code Case can be used until such time as the Code Case is published in a future revision of the applicable Regulatory Guide. At that time, if the licensee plans to continue using the Code Case, it must follow all provisions of the Code Case, including any limitations or conditions specified in the Regulatory Guide.

Relief requests do not involve license amendments, rather the NRC issues evaluation letters and safety evaluations to authorize a licensee-proposed alternative and grant relief, or give permission to deviate from the Code.

Temporary Non-Code Piping Repairs:
ASME Code Section XI specifies acceptable repair methods for flaws that exceed Code acceptance limits in Class 1, 2, and 3 piping that is in service. A Code repair is required to restore the structural integrity of flawed ASME Code piping, regardless of the operational mode of the plant when the flaw is detected. Those repairs not in compliance with ASME Code Section XI are non-Code repairs and require NRC review and approval of a relief request.

Pursuant to 10CFR50.55a(g)(6)(i), licensees may request relief due to impracticality and propose an alternative repair. NRC Generic Letter 90-05 provides guidance to licensees requesting relief for this situation.

Re-Approval of Relief Requests for a New Ten-Year Interval:
Relief requests are approved by the NRC for each Ten-Year Interval Inservice Inspection Program or Inservice Testing Program. As a result, licensees must re-submit for NRC review and approval any relief requests it desires to carry over to a new Ten-Year Interval from the previous Ten-Year Interval. Changes in the applicable ASME Code edition or addenda, as referenced in 10CFR50.55a(b) can affect the need for requesting relief, the type of relief requested, or the basis for the relief. Should the same relief be necessary, licensees must submit a new relief request for the new Ten-Year Interval for NRC review and approval.

In order to reduce the level-of-effort necessary for the NRC to again re-review the same relief request, the licensee should provide references to the previous request and resultant NRC approval. In addition, the licensee should provide a confirming statement that the circumstances and basis for the previous NRC-approved relief request has not changed, a brief discussion of any changes to the related ASME Code section(s) and their effect on the relief request, a brief discussion of any applicable aging factors to the ASME Code

component since approval of the prior relief request, and a brief discussion of any related changes in technology regarding inspection or testing of the ASME Code component.

Timing of Relief Requests and Approvals

10CFR50.55a (f)(4)(ii) requires that the Inservice Test Program be revised every ten years to meet the latest edition and addenda of the ASME Code incorporated into 10CFR50.55a(b). If there are conflicts between the revised Inservice Test Program and the plant's Operating License Technical Specifications, in accordance with 10CFR50.55a(f)(5)(ii) the licensee must submit a license amendment application to the NRC to conform the Technical Specifications to the revised program. This application is required to be submitted to the NRC at least six months prior to the start of the revised program. No timing for NRC approval is stipulated. However, since the licensee is required to comply with both the requirements of the Inservice Test Program and the Technical Specifications, the licensee should maintain close contact with the NRC with a goal of obtaining NRC approval of the Technical Specification change within the six month period.

Inservice Test Program relief requests are required by 10CFR50.55a(f)(5)(iv) to be submitted to the NRC within twelve months after the end of the associated Ten-Year Interval. However, licensees should submit relief requests as needs arise and not wait until the Ten-Year Interval is completed.

Inservice Inspection Program requirements, similar to that above, can be found in 10CFR50.55a(g).

For emerging situations involving a relief request awaiting NRC concurrence for restart of a plant from an outage or involving significant dollar commitments (e.g., alternative repair methods), it is prudent that a licensee submit the relief request to the NRC as soon as possible. For situations where relief is required for inspections, repairs, or testing to proceed and avoid delays in the schedule and economic risk (e.g., approval of a relief request to perform certain repairs will support mobilizing contractors on site), the licensee must also submit the relief request to the NRC as soon as possible. In situations where a licensee is readying for an upcoming inspection or test where special relief may be required, licensees should submit the relief request at least 30 days in advance of the need date, if possible. Since the NRC's approval of the relief request can be tailored or limited to any situation, the NRC should not delay its issuance of the requested approval, regardless of whether the actual need situation is determined to exist.

Scope of Guidance:

This White Paper includes the following relief request guidance:

- Cover letter to NRC
- Standard formats for requesting relief regarding:
  - A proposed alternative that provides an acceptable level of quality and safety (10 CFR 50.55a(a)(3)(i)).
  - A proposed alternative when complying with the Code requirement would result in hardship or unusual difficulty without a compensating increase in quality or safety (10 CFR 50.55a(a)(3)(ii)).
  - An impractical Code requirement (10 CFR 50.55a(f)(6)(i) for inservice testing; 10 CFR 50.55a(g)(6)(i) for inservice inspection).

- Use of a later Code edition and addenda (10 CFR 50.55a(f)(4)(iv) for inservice testing; 10 CFR 50.55a(g)(4)(iv) for inservice inspection).
- A proposed alternative due to inability to examine more than 90% of the reactor vessel shell weld (10 CFR 50.55a(g)(6)(ii)(A)(5)).

- A supplemental section addressing relief requests approved by the NRC for a licensee's prior Ten-Year Interval and for which the licensee is requesting re-approval for the new Ten-Year Interval.
- A page listing the regulatory commitments made by the licensee in the relief request.
- An appendix that provides a chart for use in determining the appropriate 10CFR50.55a regulation under which to seek NRC approval of the relief request.

References:

1. 10CFR50.55a, "Codes and Standards"
2. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation, Office Letter No. 808, "Relief Request Reviews".
3. NRC Regulatory Guide 1.175, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing".
4. NRC Regulatory Guide 1.178, " An Approach for Plant-Specific Risk-Informed Decisionmaking: Inservice Inspection of Piping".
5. Regulatory Guide 1.84, "Design and Code Case Acceptability – ASME Section III Division 1".
6. Regulatory Guide 1.85, "Materials Code Case Acceptability – ASME Section III Division 1".
7. Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability – ASME Section XI Division 1".
8. Draft Regulatory Guide DG-1089, "Operation and Maintenance Code Case Acceptability, ASME OM Code," dated December 2001.
9. Enclosure 2 to NRC Letter from H.N. Berkow to W.R. McCollum, Catawba Nuclear Station, dated January 4, 1996, "Technical Position on ASME Code Repair Requirements for ASME Class 3 Service Water System Piping".
10. NRC Memorandum from J.A. Norberg, Mechanical Engineering Branch, to M.J. Virgilio, Assistant Director for Region IV and V Reactors, dated August 8, 1991, "Waterford 3 TIA for Interpretation of "Practical" as Used in ASME Code Section XI, IWV-3412(a)".
11. NRC Generic Letter 90-05, "Guidance for Performing Temporary Non-Code Repair of ASME Code Class 1, 2, and 3 Piping," dated June 15, 1990.
12. NRC NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants".
13. NRC NUREG/CR-6396, "Examples, Clarifications, and Guidance on Preparing Requests for Relief from Pump and Valve Inservice Testing Requirements (INEL-95/0512), published February 1996.

[LICENSEE COVERLETTER]

[Date] 10CFR50.55a

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

SUBJECT: *[Plant/Unit Name(s)]*
Docket No(s). [50-__, 50-__]
[Brief Descriptive Title, Including the Applicable Ten-Year Interval and whether for the Inservice Test Program or Inservice Inspection Program]

REFERENCES: *[As necessary]*

Dear Sir or Madam:

Pursuant to 10 CFR 50.55a*[continue with applicable relief request section reference]*, *[licensee]* hereby requests NRC approval of the following relief request for the *[identify the applicable ten-year interval inservice testing or inspection program]*: *[provide a brief summary of the relief request]*. Enclosed are details of the relief request.

[Licensee] requests approval of this relief request by *[date]* based on *[justification]*.

[Include or attach a listing of formal licensee commitments that support the NRC's approval of the relief request].

[If the relief request is "risk-informed" inservice testing, include a statement that the guidance in NRC Regulatory Guide 1.175, "An Approach for Plant-Specific, Risk-Informed Decisionmaking: Inservice Testing," has been followed, or considered].

[If the relief request is "risk-informed" inservice inspection, include a statement that the guidance in NRC Regulatory Guide 1.178, "An Approach for Plant-Specific Risk Informed Decisionmaking: Inservice Inspection of Piping," has been followed or considered].

If you have any questions or require additional information, please contact *[licensee's point of contact for the NRC Office of Nuclear Reactor Regulation]* at *[telephone number]*.

Sincerely,

[Signature]
[Name]
[Title]

Enclosures
[Relief Request]
[Listing of Commitments]

cc: *[Regional Administrator]*
[NRR Project Manager]
[Plant/Unit Resident Inspector]

(The following are formatted templates for the different types of relief requests.)

TEMPLATE 1

Relief Request Number ***[Licensee assigns unique designation]***

Proposed Alternative
In
Accordance with 10 CFR 50.55a(a)(3)(i)
-Alternative Provides Acceptable Level of Quality and Safety-

[This type of relief can be requested for both inservice inspection items and inservice testing items.]

1. ASME Code Component(s) Affected
   [Provide a description of, the class type, and the quantity of ASME Code components affected. Ensure that each affected component, weld, etc. is listed, not just referred to generically. For example, include the component number, the weld identification numbers, etc.]

2. Applicable Code Edition and Addenda
   [Provide the Code Edition and Addenda that is applicable to the program interval for the relief request.]

3. Applicable Code Requirement
   [Provide the specific Code requirement (e.g., section, subsection, and paragraph) from which relief is being requested. Each relief request should contain only one Code requirement from which relief is being requested.]

4. Proposed Alternative
   [Provide the reason for the request and describe the proposed alternative to the applicable Code requirement. Sketches may be provided. State when the proposed alternative inspection or testing will be performed.]

5. Basis of Alternative for Providing Acceptable Level of Quality and Safety
   [Provide technical justification as to how the proposed alternative will provide an acceptable level of quality and safety to that of the applicable Code requirement. Note: Do not discuss impracticality, burden, hardship, or unusual difficulty. Note the basis should conclude with a statement that granting of the relief would provide an acceptable level of quality and safety, and would not adversely impact the health and safety of the public.]

6. Duration of Proposed Relief Request
   [Provide the duration of the authorized alternative. Note: The duration must be within the program interval. Note: For approval of a Code Case being used as the alternative, also state "the use of the Code Case is requested until the NRC publishes the Code Case in a future revision of the applicable Regulatory Guide".]

7. Precedents

[Cite any identified precedents (including plant name, docket number and approval TAC number/date) which have similar situations and NRC staff authorized relief. If approved by the NRC staff for the plant's previous interval, cite the submittal and approval TAC number/date.]

8. References

[This section is included only if references, beyond those in Section 7 above, should be identified.]

TEMPLATE 2

Relief Request Number *[Licensee assigns unique designation]*

Proposed Alternative
In
Accordance with 10 CFR 50.55a(a)(3)(ii)
-Hardship or Unusual Difficulty without Compensating Increase in Level of Quality or Safety-

[This type of relief can be requested for both inservice inspection items and inservice testing items.]

1. ASME Code Component(s) Affected

   [Provide a description of, the class type, and the quantity of ASME Code components affected. Ensure that each affected component, weld, etc. is listed, not just referred to generically. For example, include the component number, the weld identification numbers, etc.]

2. Applicable Code Edition and Addenda

   [Provide the Code Edition and Addenda that is applicable to the program interval for the relief request.]

3. Applicable Code Requirement

   [Provide the specific Code requirement (e.g., section, subsection, and paragraph) from which relief is being requested. Each relief request should contain only one Code requirement from which relief is being requested.]

4. Basis for Hardship or Unusual Difficulty without Compensating Increase in Level of Quality or Safety

   [Provide the reason for the request. Describe the hardship or unusual difficulty the Code requirement causes and why there is no compensating increase in level of quality or safety. Examples of hardship or unusual difficulty include: a need to enter multiple Technical Specification action statements, radiation ALARA concerns, minor hardware changes, or high costs to perform. Note: Do not mention impracticality. The basis should conclude with a statement that granting of the relief would not adversely impact the health and safety of the public.]

5. Proposed Alternative and Basis for Use

   [Describe the proposed alternative and provide technical justification for its use. Sketches may be provided. (For inservice testing items, discuss why the proposed alternative provides reasonable assurance that the component or system is operationally ready. For inservice inspection items, discuss why the proposed

alternative provides reasonable assurance of structural integrity.) State when the proposed alternative will be performed.]

6. Duration of Proposed Relief Request

[Provide the duration of the authorized alternative. Note: The duration must be within the program interval. Note: For approval of a Code Case being used as the alternative, also state "the use of the Code Case is requested until the NRC publishes the Code Case in a future revision of the applicable Regulatory Guide".]

7. Precedents

[Cite any identified precedents (including plant name, docket number and approval TAC number/date) which have similar situations and NRC staff authorized relief. If approved by the NRC staff for the plant's previous interval, cite the submittal and approval TAC number/date.]

8. References

[This section is included only if references, beyond those in Section 7 above, should be identified.]

TEMPLATE 3

Relief Request Number *[Licensee assigns unique designation]*

Proposed Use of Later ASME Code Edition and Addenda
In
Accordance with 10 CFR 50.55a(f)(4)(iv) for Inservice Testing Item(s)
(or 10 CFR 50.55a(g)(4)(iv)for Inservice Inspection Items)

[This type of relief can be requested for both inservice inspection items and inservice testing items.]

1. ASME Code Component(s) Affected

[Provide a description of, the class type, and the quantity of ASME Code components affected. Ensure that each affected component, weld, etc. is listed, not just referred to generically. For example, include the component number, the weld identification numbers, etc.]

2. Applicable Code Edition and Addenda

[Provide the Code Edition and Addenda that is applicable to the program interval for the relief request.]

3. Applicable Code Requirement

[Provide the specific Code requirement (e.g., section, subsection, and paragraph) from which relief is being requested. Each relief request should contain only one Code requirement from which relief is being requested.]

4. Proposed Alternative Code Requirement

[Provide the reason for the request. Discuss the proposed alternative Code requirement and all related Code and Addenda requirements. Sketches may be provided.

5 Basis of Using Alternative Code Requirement and Adoption of Limitations and Modifications of 10CFR50.55a(b)

[Provide technical justification for using the alternative Code requirement. Discuss the adoption of limitations and modifications of 10CFR50.55a(b). Do not discuss impracticality, burden, hardship, or unusual difficulty. The basis should conclude with a statement that granting of the relief would not adversely impact the health and safety of the public.]

6. Duration of Proposed Relief Request

[Provide the duration of the authorized alternative. Note: The duration must be within the program interval.]

7 Precedents

[Cite any identified precedents (including plant name, docket number and approval TAC number/date) which have similar situations and NRC staff authorized relief. If approved by the NRC staff for the plant's previous interval, cite the submittal and approval TAC number/date.]

8 References

[This section is included only if references, beyond those in Section 7 above, should be identified.]

TEMPLATE 4

Relief Request Number ***[Licensee assigns unique designation]***

Proposed Alternative
In
Accordance with 10 CFR 50.55a(f)(6)(i)
-Inservice Testing Impracticality-

1. ASME Code Component(s) Affected

   [Provide a description of, the class type, and the quantity of ASME Code components affected. Ensure that each affected component, weld, etc. is listed, not just referred to generically. For example, include the component number, the weld identification numbers, etc.]

2. Applicable Code Edition and Addenda

   [Provide the Code Edition and Addenda that is applicable to the program interval for the relief request.]

3. Applicable Code Requirement

   [Provide the specific Code requirement (e.g., section, subsection, and paragraph) from which relief is being requested. Each relief request should contain only one Code requirement from which relief is being requested.]

4. Impracticality of Compliance

   [Provide the reason for the request. Describe why the inservice testing Code requirement is impractical. Do not mention hardship of unusual difficulty. Sources of inservice testing impracticality include: Potential to cause a reactor trip, damage to a system or a component, or an excessive personnel hazard; risk associated with a test-induced component failure; effect on plant safety; excessively high cost; existing technology will not provide meaningful results; extreme difficulty in performing the test. If basing impracticality on a physical limitation or obstruction, describe or provide drawings or sketches. If basing the impracticality on radiation exposure of test personnel, provide the following information: the total estimated rem exposure involved in the testing, the radiation levels in the test area, the use of flushing or shielding to reduce radiation levels, and any other considerations (e.g., the potential for doing remote inspections, or the ALARA impacts of previous inspections if performed).]

5. Burden Caused by Compliance

   [Describe the burden that would be caused by attempting to comply with the Code requirement, such as replacing a component, redesigning a system, or shutting down the plant. Do not mention hardship or unusual difficulty.]

6. Proposed Alternative and Basis for Use

[Describe the proposed alternative and provide technical justification as to why the proposed alternative testing provides reasonable assurance that the component or system is operationally ready. State when the proposed alternative inspection will be performed The basis should conclude with a statement that granting of the relief would not adversely impact the health and safety of the public.]

7. Duration of Proposed Relief Request

[Provide the duration of the authorized alternative. Note: The duration must be within the program interval. Note: For approval of a Code Case being used as the alternative, also state "the use of the Code Case is requested until the NRC publishes the Code Case in a future revision of the applicable Regulatory Guide".]

8. Precedents

[Cite any identified precedents (including plant name, docket number and approval TAC number) which have similar situations and NRC staff authorized relief. If approved by the NRC staff for the plant's previous interval, cite the submittal and approval TAC number/date.]

9. References

[This section is included only if references, beyond those in Section 8 above, should be identified.]

TEMPLATE 5

Relief Request Number *[Licensee assigns unique designation]*

Proposed Alternative
In
Accordance with 10 CFR 50.55a(g)(6)(i)
-Inservice Inspection Impracticality-

1. ASME Code Component(s) Affected

   [Provide a description of, the class type, and quantity of ASME Code components affected. Ensure that each affected component, weld, etc. is listed, not just referred to generically. For example, include the component number, the weld identification numbers, etc.]

2. Applicable Code Edition and Addenda

   [Provide the Code Edition and Addenda that is applicable to the program interval for the relief request.]

3. Applicable Code Requirement

   [Provide the specific Code requirement (e.g., section, subsection, and paragraph) from which relief is being requested. Each relief request should contain only one Code requirement from which relief is being requested.]

4. Impracticality of Compliance

   [Provide the reason for the request. Describe why the inservice inspection Code requirement is impractical. Do not mention hardship or unusual difficulty. Causes of impracticality include: Limitations of design, geometry, and materials of construction (provide drawings or figures, as appropriate, to show specific limitations or obstructions); requires a major hardware modification; potential to cause a reactor trip, damage to a system or component, or an excessive personnel hazard; existing technology will not provide meaningful results; extreme difficulty in performing the inspection. If basing the impracticality on radiation exposure of examination personnel, provide the following information: the total estimated rem exposure involved in the examination, the radiation levels in the examination area, the use of flushing or shielding to reduce radiation levels, and any other considerations.]

5. Burden Caused by Compliance

   [Describe the burden that would be caused by attempting to comply with the Code requirement, such as replacing a component, redesigning the system, or shutting down the plant. Do not mention hardship or unusual difficulty.]

6. Proposed Alternative and Basis for Use

[Describe the proposed alternative and provide technical justification as to why the proposed alternative inspection provides reasonable assurance of structural integrity. State when the proposed alternative inspection will be performed. Do not mention hardship or unusual difficulty. Sketches may be provided. The basis should conclude with a statement that granting of the relief would not adversely impact the health and safety of the public.]

7. Duration of Proposed Relief Request

[Provide the duration of the authorized alternative. Note: The duration must be within the program interval. Note: For approval of a Code Case being used as the alternative, also state "the use of the Code Case is requested until the NRC publishes the Code Case in a future revision of the applicable Regulatory Guide".]

8. Precedents

[Cite any identified precedents (including plant name, docket number and approval TAC number) which have similar situations and NRC staff authorized relief. If approved by the NRC staff for the plant's previous interval, cite the submittal and approval TAC number/date.]

9. References

[This section is included only if references, beyond those in Section 8 above, should be identified.]

TEMPLATE 6

Relief Request Number ***[Licensee assigns unique designation]***

Proposed Alternative
In
Accordance with 10 CFR 50.55a(g)(6)(ii)(A)(5) and 10CFR50.55a(a)(3)(i)
-Augmented Reactor Vessel Shell Weld Examination-

1. ASME Code Components Affected

   [Provide a description of the affected welds. Ensure that each affected component, weld, etc. is listed, not just referred to generically. For example, include the component number, the weld identification numbers, etc.]

2. Applicable Code Edition and Addenda

   [Provide the Code Edition and Addenda that is applicable to the program interval for the relief request].

3. Applicable Code Requirement

   [Provide the Code requirement (e.g., section, subsection, and paragraph) from which relief is being requested (Examination of more than 90% of each weld volume). Each relief request should contain only one Code requirement from which relief is being requested.]

4. Determination of Limits of Weld Volume Examination

   [Provide the reason for the request. Describe the means by which the limits of the weld volume examination were determined, the percent of each weld volume that was examined, and why more of the weld volume could not be examined. If the Code-required examination cannot be performed due to a limitation or obstruction, describe or provide drawings showing the specific limitation or obstruction. Do not mention hardship or unusual difficulty.]

5. Proposed Alternative and Basis for Use

   [Describe the proposed alternative and provide technical justification as to why the proposed alternative provides an acceptable level of quality and safety, and reasonable assurance of structural integrity. Sketches may be provided. The basis should conclude with a statement that granting of the relief would not adversely impact the health and safety of the public.]

6. Duration of Proposed Relief Request

   [Provide the duration of the authorized alternative. Note: The duration must be within the program interval.]

7. Precedents

[Cite any identified precedents (including plant name, docket number and approval TAC number) which have similar situations and NRC staff authorized relief. If approved by the NRC staff for the plant's previous interval, cite the submittal and approval TAC number/date.]

8. References

[This section is included only if references, beyond those in Section 7 above, should be identified.]

TEMPLATE 7

Relief Request Number *[Licensee assigns unique designation]*

Supplemental Information to Support NRC Re-Approval of Relief Request for New Ten-Year Interval Inservice *[Inspection or Testing]* **Program**

[This supplemental information can be provided for both inservice inspection and inservice testing program relief requests for which re-approval is being sought.]

1. Previous Relief Request Approved by NRC

   [From the relief request approved by the NRC during the previous Ten-Year Interval and for which re-approval is being sought, provide the Relief Request Number and ASME Code components to which it applied, the Relief Request submittal letter reference(s) and the NRC approval letter reference. Ensure that each affected component, weld, etc. is listed, not just referred to generically. For example, include the component number, the weld identification numbers, etc.]

2. Changes to the Applicable ASME Code Section

   [Briefly address any changes made to the related ASME Code Section since the previous relief request was approved, and why they have no effect on the relief request.]

3. Component Aging Factors

   [Briefly discuss why component aging factors do not have an effect on the basis for the relief request for which re-approval is being sought.]

4 Changes in Technology for *[Inspecting or Testing]* the Affected ASME Code Component(s)

   [Briefly discuss that changes in technology do not affect the basis for the previous Relief Request.]

5 Confirmation of Renewed Applicability

   [Provide a confirmation statement that based on the information contained within the previous relief request, information contained within the NRC approval documents, and information above, the circumstances and basis continues to be applicable to the proposed relief request. The confirmation should conclude with a statement that granting of the relief would not adversely impact the health and safety of the public.]

6 Duration of Re-Approved Relief Request

   [Provide the duration of the relief request.. Note: The duration must be within the program interval.]

7 References

[This section is included only if references, beyond those in Section 6 above, should be identified.]

List of Regulatory Commitments

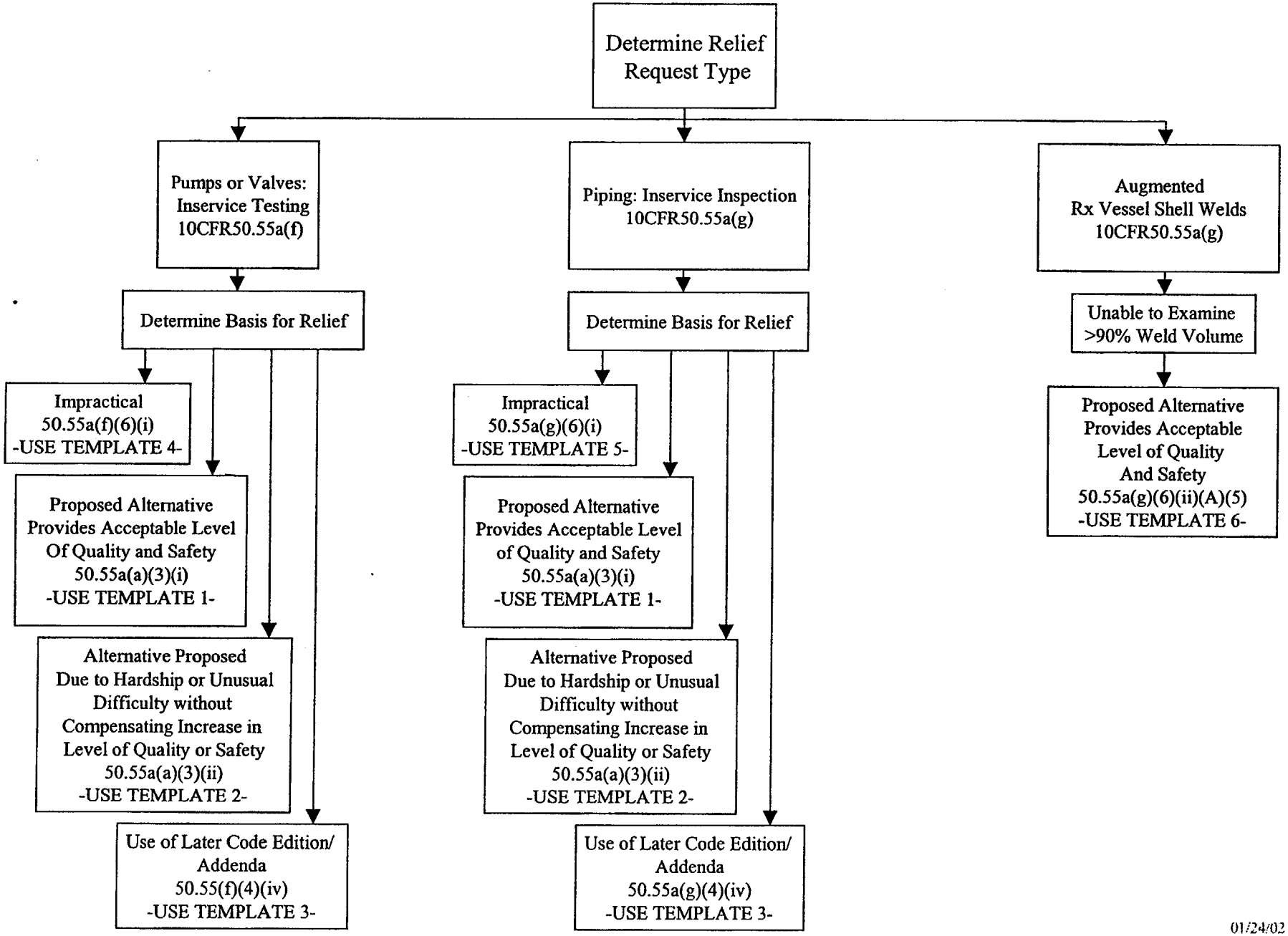
The following table identifies those actions committed to by *(Licensee)* in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to *(name of Licensee contact).*

REGULATORY COMMITMENTS	DUE DATE/EVENT
[List commitments made in the request.]	*[Add due dates or events by which the corresponding commitment must be completed.]*

APPENDIX

ASME CODE RELIEF REQUEST
DETERMINATION CHART

ASME B&PV CODE RELIEF REQUEST DETERMINATION CHART



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