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IPN-02-026
April 10, 2002

Robert J. Barrett
Vice President, Operations
Indian Point 3

U.S. Nuclear Regulatory Commission
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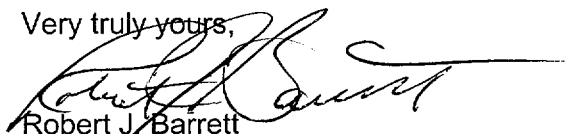
Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
Relief Request RR3-29(S) For Inservice Inspection Program

Dear Sir:

The purpose of this letter is to submit a request for relief for the Inservice Inspection Program, pursuant to 10 CFR 50.55a. Relief request RR3-29(S) is to allow visual examination of snubbers in accordance with IWF-2510. The relief request demonstrates that the proposed alternative would provide an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

There are no new commitments made by this letter. If you have any questions, please contact Mr. Kevin Kingsley at (914) 734-6034.

Very truly yours,


Robert J. Barrett
Vice President - Operations
Indian Point 3 Nuclear Power Plant

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Attachment as stated

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
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Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
295 Broadway, Suite 3
P.O. Box 337
Buchanan, NY 10511-0308

Mr. Patrick Milano, Project Manager
Project Directorate I
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
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Mr. Paul Eddy
NYS Department of Public Service
3 Empire Plaza
Albany, NY 12223

Indian Point 3
Third Inservice Inspection Interval
Relief Request No. 3-29 (S)

A. ARTICLE IDENTIFICATION

IWF-1000
Class: 1, 2, and 3
System: All

B. EXAMINATION REQUIREMENTS

ASME Section XI 1989 Edition, Paragraph IWF-1220:

The Inservice Inspection requirements for snubbers shall be in accordance with the requirements of IWF-5000.

C. RELIEF REQUESTED

Indian Point 3 requests relief from inspecting ISI snubbers in accordance with IWF-5000. Specifically, it is requested that the provisions of IWF-2510 be applied to snubbers. Pursuant to 10CFR50.55a(a)(3)(i) relief is requested on the basis that the proposed alternatives discussed in this request for relief would provide an acceptable level of quality and safety.

D. BASIS FOR RELIEF

The exemptions allowed by IWF-2510 should apply to component standard supports, including snubbers. IWF-1220 refers to IWF-5000 for snubber requirements. IWF-5000 refers to ASME/ANSI OM-1987, Part 4, which does not contain any exemptions. This limits the ability of licensees to utilize the exemptions of IWF-2510. There is no safety reason for this limitation.

E. ALTERNATIVE EXAMINATIONS OR TESTS

All snubbers exempted from the VT-3 exam by IWF-2510, will be visually examined in accordance with requirements in the Indian Point 3 (IP3) Technical Requirements Manual. These requirements were originally added to the Technical Specifications in response to Generic Letter 84-13 but were subsequently relocated with the adoption of Improved Technical Specifications.

Indian Point 3
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F. JUSTIFICATION FOR REQUESTING RELIEF

IWF-2510 states that component supports selected for examination shall be the supports of those components that are required to be examined under IWB, IWC, IWD, and IWE during the first inspection interval. Paragraph IWC-1222(a) exempts vessels, piping, pumps, valves, and other components NPS 4 and smaller from volumetric and surface examinations. This allows 3" ISI Class 2 component supports to be exempt from the requirement to perform a VT-3 inspection.

IWF-1220 requires snubber inspections to be performed in accordance with IWF-5000. IWF-5000 requires VT-3 inspections and does not contain any paragraph regarding exemptions. Therefore, a snubber on a 3" ISI Class 2 line would require a VT-3 inspection while a component support such as a U-bolt can would not.

This difference in inspection requirements for supports is inconsistent. It would be possible for a snubber to be located adjacent to a U-bolt type support, both supporting the same line, and the U-bolt would not require a VT-3 but the snubber would require a VT-3. This relief request would allow the same exemptions applied to the VT-3 examination of component supports to be applied to the VT-3 examination of snubbers.

If this relief request is approved, snubbers exempted by paragraph IWF-2510 will still be visually inspected in accordance with the Technical Requirement Manual and functionally tested in accordance with ASME/ANSI OM-4.

G. IMPLEMENTATION SCHEDULE

The requirements as specified in this relief request will be incorporated into the IP3 Inservice Inspection Program during the 3rd Ten-Year Interval.

H. ATTACHMENTS TO THE RELIEF

None.