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April 8, 2002

SVP-02-033

U. S. Nuclear Regulatory Commission
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Washington, DC 20555

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Relief Request CR-38, Inservice Inspection Program Relief Regarding 10 Hour Annual Training requirements of the American Society of Mechanical Engineers (ASME) Section XI, 1995 Edition with 1996 Addenda, Appendix VII

Reference: Letter from the U.S. NRC to Oliver D. Kingsley (Exelon Generation Company, LLC), Dresden Nuclear Station, Units 2 and 3 – Relief Requests Nos. CR-22 and CR-23 (TAC Nos. MB2115 and MB2116)

Quad Cities Nuclear Power Station (QCNPS) is submitting Relief Request CR-38 to request relief from the annual ultrasonic training provisions of Subarticle VII-4240, "Annual Training", of Section XI of the American Society of Mechanical Engineers (ASME) Section XI, 1995 Edition with 1996 Addenda, Appendix VII.

Relief is being requested in accordance with 10 CFR 50.55a(a)(3)(i) on the basis that the proposed alternative will provide an acceptable level of quality and safety. The proposed relief request is provided as an attachment to this letter.

The proposed relief request is similar to relief request CR-22 approved by the NRC for use at Dresden Nuclear Power Station (see reference above).

It is requested this proposed relief request be approved by November 2002 to permit usage in the upcoming QCNPS, Unit 1 refuel outage currently scheduled to begin November 5, 2002.

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Should you have any questions concerning his letter, please contact Wally Beck at (309) 227-2800.

Respectfully,

Timothy J. Tulon
Site Vice President
Quad Cities Nuclear Power Station

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

RELIEF REQUEST NUMBER: CR-38
REVISION 0

COMPONENT IDENTIFICATION

Code Classes:	All
Reference:	ASME Section XI, 1995 Edition with 1996 Addenda, Appendix VII, Subsubarticle VII-4240, "Annual Training"
Examination Categories:	All categories for components subject to Ultrasonic Examination
Item Numbers:	All item numbers for components subject to Ultrasonic Examination
Description:	Alternative Requirements to ASME Section XI, 1995 Edition with 1996 Addenda, Appendix VII, Subsubarticle VII-4240, "Annual Training"
Component Numbers:	All Components Subject to Ultrasonic Examination

CODE REQUIREMENT

10 CFR 50.55a, "Codes and Standards," paragraph (b)(2) incorporates by reference the 1995 Edition and Addenda through 1996 of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for use in preparing inservice inspection programs. Subsubarticle VII-4240, "Annual Training," of Section XI of the ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII, requires a minimum of 10 hours annual training.

10 CFR 50.55a(b)(2)(xiv), "Appendix VIII personnel qualification," requires that all personnel qualified to perform ultrasonic examinations in accordance with Section XI of the ASME Code, Appendix VIII, shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be completed no earlier than 6 months prior to performing ultrasonic examinations at a licensee's facility.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED

Relief is requested from the training provisions of Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII.

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the training provision of Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with 1996 Addenda, Appendix VII, that requires a minimum of 10 hours annual training. The basis of the relief is that the proposed alternative would provide an acceptable level of quality and safety.

On September 22, 1999, the NRC published a final rule in the Federal Register (64 FR 51370) to amend 10 CFR 50.55a(b)(2), to incorporate by reference the 1995 Edition and addenda through the 1996 Addenda, of Section XI of ASME Code. The change included the requirement to have a minimum of 10 hours of annual training contained in Subsubarticle VII-4240 of Section XI of ASME Code.

Additionally, the September 22, 1999, Federal Register notice amended 10 CFR 50.55a(b)(2)(xiv). The amended 10 CFR 50.55a(b)(2)(xiv) requires that all personnel qualified to perform ultrasonic examinations in accordance with Appendix VIII of the ASME Code shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be taken no earlier than 6 months prior to performing examinations at a licensee's facility. Paragraph 2.4.1.1.1 in the Federal Register notice contained the following statement, which includes a discussion of the Electric Power Research Institute (EPRI) Performance Demonstration Initiative (PDI) program.

> "The NRC had determined that this requirement (i.e., Subsubarticle VII-4240) was inadequate for two reasons. The first reason was that the training does not require laboratory work and examination of flawed specimens. Signals can be difficult to interpret and, as detailed in the regulatory analysis for this rulemaking, experience and studies indicate that the examiner must practice on a frequent basis to maintain the capability for proper interpretation. The second reason is related to the length of training and its frequency. Studies have shown that an examiner's capability begins to diminish within approximately 6 months if skills are not maintained. Thus, the NRC had determined that 10 hours of annual training is not sufficient practice to maintain skills, and that an examiner must practice on a more frequent basis to maintain proper skill level... The PDI program has adopted a requirement for 8 hours of training, but it is required to be hands-on practice. In addition, the training must be taken no earlier than 6 months prior to performing examinations at a licensee's facility. PDI believes that 8 hours will be acceptable relative to an examiner's abilities in this highly specialized skill area because personnel can gain knowledge of new developments, material failure modes, and other pertinent technical topics through other means. Thus, the NRC has decided to adopt in the Final Rule the PDI position on this matter. These changes are reflected in 10CFR50.55a(b)(2)(xiv) of the final rule."

Implementation of the training requirements contained in Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII and 10CFR50.55a(b)(2)(xiv) will result in redundant training programs. The approval of this relief request to qualify our personnel to perform ultrasonic examinations in accordance with 10CFR50.55a(b)(2)(xiv) will simplify record keeping, satisfy the need to maintain skills, and provide an acceptable level of quality and safety.

PROPOSED ALTERNATE PROVISIONS

Annual ultrasonic training shall be conducted in accordance with 10 CFR 50.55a(b)(2)(xiv) in lieu of Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII. The annual ultrasonic training shall require that all personnel qualified for performing ultrasonic examination in accordance with Section XI of the ASME Code, Appendix VIII, shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be completed no earlier than 6 months prior to performing ultrasonic examinations at a licensee's facility.

APPLICABLE TIME PERIOD

Relief is requested for the third 10-year interval of the Inservice Inspection Program for Quad Cities Station Unit 1 and Unit 2, which conclude February 17, 2003 and March 9, 2003 respectively.