



Entergy Nuclear Operations, Inc.
Pilgrim Station
600 Rocky Hill Road
Plymouth, MA 02360

William J. Riggs
Director, Nuclear Assessment

June 5, 2002

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

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Pilgrim Relief Request (PRR)-27 Relief from 1989 ASME Code Section XI requirements for Certification of VT-2 visual examination personnel.

LETTER NUMBER: 2.02.051

Dear Sir or Madam:

This letter requests NRC approval of Pilgrim Relief Request (PRR) No. 27, in support of refueling outage (RFO)-14. RFO-14 is scheduled to begin in April 2003.

Pilgrim has implemented 1989 ASME Code, Section XI requirements and is in the Third In-service Inspection (ISI) interval that ends in July 2005.

This relief request is submitted in accordance with 10CFR50.55a(a)(3)(i) and applies to the qualification of personnel specified in Article IWA-2300 for performing VT-2 visual examination in accordance with Articles IWA-2212 and IWA-5240. This relief request is based on ASME Code Case N-546, "Alternative Requirements for Qualification of VT-2 Examination Personnel, Section XI, Division 1. The attachment provides PRR-27 for your review and approval. Upon approval from NRC, the relief request will be incorporated into the Third ISI interval program.

Scope of The Relief Request

Articles IWA-2212 and IWA-5240 prescribe the scope of VT-2 examinations. The VT-2 visual examination applies to leakage detection from pressure retaining components or abnormal leakage from components with or without leakage collection systems.

Article IWA-2312 stipulates that personnel performing visual examinations or using other NDE methods not addressed in SNT-TC-1A, shall be qualified and certified to comparable levels of qualification as defined in SNT-TC-1A and the employer's written practice. As an alternative to the Article IWA-2312 stipulated requirement, Pilgrim will certify selected VT-2 examiners in accordance with Code Case N-546.

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Alternative Method

The ASME Code Case N-546 provides an alternative to Article IWA-2312. The designated plant personnel (e.g., licensed and non-licensed operators, system engineers, testing technicians) with the specified training and plant walk down experience need not be qualified nor certified to comparable levels of competence in accordance with SNT-TC-1A. Instead, experience in identifying equipment problems and knowledge of operating conditions will enhance the ability of plant personnel to locate leakage during VT-2 examinations. With the specified four hours of training on Section XI requirements and plant specific procedures for VT-2 examinations, the designated plant personnel will understand how leaks should be identified and documented and be fully capable of performing VT-2 examinations.

Further, a VT-2 examination is a simple examination for leakage. No special skills or technical training are required in order to observe water dripping from a component or bubbles forming on a joint wetted with leak detection solution. As such, qualification in accordance with the provisions of Code Case N-546 will not constitute a reduction in the level of quality and safety at Pilgrim Station. The qualification of personnel for VT-2 examinations under Code Case N-546 is less of a burden than maintaining the present VT-2 certification to levels comparable to those outlined in SNT-TC-1A.

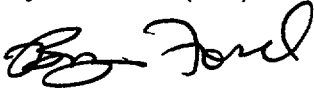
Use of this Code Case increases the pool of available personnel certified to perform VT-2 examinations. Certification of personnel already required to perform functions in the plant will reduce the number of personnel required to enter radiologically restricted areas, thereby enhancing efforts to keep radiation exposure as low as reasonably achievable.

This alternative method described above provides an acceptable level of quality and safety as required by 10 CFR 50.55a(a)(3)(i).

The NRC has previously approved the alternative provided by ASME Code Case N-546 for other licensed facilities (STP, Docket Nos. 50-498 and 499, TAC Nos. M98134 and M98135, dated May 12, 1997; Duane Arnold, Docket No. 50-331, TAC No. M99836, dated April 1, 1998; Hatch, Docket Nos. 50-321 and 366, TAC Nos. MA2118 and MA2119, dated September 3, 1998).

Pilgrim intends to implement the approved relief request for RFO-14. Accordingly, Pilgrim seeks NRC approval by March 2003.

If you have any questions regarding the information contained in this letter, please contact Bryan Ford at (508) 830-8403.



for W. Riggs

Attachment: Pilgrim Relief Request No. 27 – 2 Pages

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Pilgrim Nuclear Power Station

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SYSTEM/COMPONENT(S) FOR WHICH RELIEF IS REQUESTED

Code Classes: 1, 2, and 3

References: ASME Section XI 1989 edition, paragraph IWA-2300; ASME Code Case N-546, "Alternate Requirements for Qualification of VT-2 Examination Personnel, Section XI, Division 1"; ASNT SNT-TC-1A 1984 edition

Examination Categories: B-E, B-P, C-B, C-H, D-A, D-B, and D-C

Item Numbers: B4.10 through B4.13, B15.10 through B15.71, C2.3 3, C7.1 0 through C7.80, D1.10, D2.10, D3.10

Component Numbers: All pressure retaining components within each system boundary subjected to a system hydrostatic/system pressure test.

CODE REQUIREMENTS

IWA-2312 states "Personnel performing visual examinations or using other NDE methods not addressed in SNT-TC-1A shall be qualified and certified to comparable levels of qualification as defined in SNT-TC-1A and the Employer's written practice."

BASIS FOR RELIEF

The VT-2 visual examination is conducted in accordance with ASME Section XI, paragraph IWA-2212 and subarticle IWA-5240 to locate evidence of leakage from pressure retaining components, or abnormal leakage from components with or without leakage collection system, as required, during the conduct of pressure testing.

As stated in Code Case N-546, plant personnel (e.g., licensed and non-licensed operators, system engineers, testing technicians) with the specified training and plant walkdown experience need not be qualified nor certified to comparable levels of competence in accordance with SNT-TC-1A. Experience in identifying equipment problems and knowledge of operating conditions will enhance the ability of plant personnel to locate leakage during VT-2 examination. With the specified four hours of training on Section XI requirements and plant specific procedures for VT-2 examinations, the designated plant personnel will understand how leaks should be identified and documented and be fully capable of performing VT-2 examinations.

A VT-2 examination is a simple examination for leakage. No special skills or technical training are required in order to observe water dripping from a component or bubbles forming on a joint wetted with leak detection solution. As such, qualification in accordance with the provisions of Code Case N-546 will not constitute a reduction in the level of quality and safety at Pilgrim Station. The qualification of personnel for VT-2 examinations under Code Case N-546 is less of

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a burden than maintaining the present VT-2 certification to levels comparable to those outlined in SNT-TC-1A.

Use of this Code Case increases the pool of available personnel certified to perform VT-2 examinations. Certification of personnel already required to perform functions in the plant will reduce the number of personnel required to enter radiologically restricted areas, thereby enhancing efforts to keep radiation exposure as low as reasonably achievable.

Additionally, use of on-shift personnel will improve the process of returning systems to service. Prompt return to service of safety systems will improve the safety of the plant and the public.

Code Case N-546 allows those personnel most familiar with the walkdown of plant systems, such as licensed and non-licensed operators, local leak rate personnel, system engineers, inspection and nondestructive examination personnel to perform VT-2 examinations without formal qualification and certification. These personnel typically have a sound working knowledge of plant components and piping layouts which makes them acceptable candidates for performing VT-2 visual examinations.

ALTERNATE EXAMINATIONS

Pilgrim Station will certify selected VT-2 examiners (licensed and non-licensed operators, local leak rate personnel, system engineers, maintenance supervisors, inspection and nondestructive examination personnel) in accordance with Code Case N-546 as an alternative to paragraph IWA-2300 of ASME Section XI which requires certification to a level comparable to SNT-TC-1A and the Employer's written practice.

Case N-546 requires the following qualifications for VT-2 examiners:

1. At least 40 hours plant walkdown experience, such as that gained by licensed and non-licensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel.
2. At least 4 hours of training on Section XI requirements and plant specific procedures for VT-2 visual examination.
3. Vision test requirements of IWA-2321, 1995 Edition.

PNPS will also implement procedural guidelines to ensure that consistent, quality VT-2 visual examinations are performed and will verify and maintain records to verify that persons selected are qualified by meeting the requirements of Code Case N-546. Additionally, an independent review and evaluation of all examination data indicating leakage shall be performed by persons other than those that performed the VT-2 examination.