



Nine Mile Point
Nuclear Station

August 14, 2002
NMP1L 1685

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

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63
TAC No. MB4085

Subject: Request for Authorization to Use Risk-Informed Inservice Inspection Alternative

Gentlemen:

By letter dated February 22, 2002 (NMP1L 1644), Nine Mile Point Nuclear Station, LLC (NMPNS) submitted inservice inspection (ISI) relief request ISI-22 for Nine Mile Point Unit 1 (NMP1). This relief request proposed use of an alternative risk-informed ISI methodology in lieu of certain ASME Code Section XI requirements. The alternative methodology was developed by the Electric Power Research Institute (EPRI) and is included in EPRI topical report 112657, "Revised Risk-Informed Inservice Inspection Evaluation Procedure," Rev. B-A.

Section 5.2 of Attachment 1 to the relief request took exception to the EPRI methodology concerning the statement: "For flaws not exceeding acceptance criteria, items shall be examined for the next three inspection periods." Section 5.2 characterized this statement as "an inadvertent typographical error."

Based on a telephone discussion with the NRC staff on August 7, 2002, NMPNS now believes that the EPRI statement is ambiguous, but not erroneous. The technical basis for this change is that the term "acceptance criteria" in the statement should be understood as referring to the criteria in subsection IWB-3600 of Section XI and not the criteria in subsection IWX-3500 of Section XI of the ASME Code.

In light of the above clarification, the two paragraphs in Section 5.2 of Attachment 1 to the relief request are to be replaced with the following:

"There are no exceptions taken to the EPRI methodology."

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As stated in the February 22, 2002, letter, NMPNS requests NRC authorization for use of the proposed alternative by November 30, 2002, to support planning efforts for Refueling Outage Number 17.

Very truly yours,



Bruce S. Montgomery
General Manager Nuclear Engineering

BSM/JJD/jm

cc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)