

November 18, 2002

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: COLUMBIA GENERATING STATION - RELIEF REQUEST 2ISI-25 TO THE
INSERVICE INSPECTION (ISI) PROGRAM PLAN FOR THE SECOND
INSPECTION INTERVAL (TAC NO. MB3527)

Dear Mr. Parrish:

By letter dated November 2, 2001, as supplemented by letter dated September 10, 2002, you submitted a request for relief from certain American Society of Mechanical Engineers (ASME) Code Section XI requirements for ISI at the Columbia Generating Station. The request for relief proposes ASME approved Code Case N-528-1 [Purchase, Exchange, or Transfer of Material Between Nuclear Plant Sites Section XI Division 1] as an alternative to the requirements of IWA-7000 when material meeting the definition in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites. The staff has reviewed and evaluated the information provided in Relief Request 2ISI-25.

The staff's safety evaluation is enclosed. Based on the evaluation, the use of ASME approved Code Case N-528-1 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) in that the proposed alternative provides an acceptable level of quality and safety. The requirements of 10 CFR Part 21 are to be applied to the nuclear plant site supplying the material as well as to the nuclear plant site receiving the material that has been purchased, exchanged, or transferred between sites. Should Code Case N-528-1 be approved by reference in a future revision to Regulatory Guide (RG) 1.147 prior to the end of the licensee's second 10-year inservice inspection interval, the licensee must follow all provisions in Code Case N-528-1 with the limitations, if any, issued in RG 1.147, should the licensee intend to continue implementing the Code Case.

Sincerely,

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Safety Evaluation

cc w/encl: See next page

Columbia Generating Station

cc:

Mr. Rodney L. Webring (Mail Drop PE04)
Vice President, Nuclear Generation
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Mr. Dale Atkinson (Mail Drop PE08)
Vice President, Technical Services
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Mr. Albert E. Mouncer (Mail Drop 1396)
Vice President, Corporate Services/
General Counsel/CFO
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Thomas C. Poindexter, Esq.
Winston & Strawn
1400 L Street, N.W.
Washington, DC 20005-3502

Chairman
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, WA 98504-3172

Mr. Bob Nichols
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, WA 98504-3113

Mr. D. W. Coleman (Mail Drop PE20)
Manager, Performance Assessment
and Regulatory Programs
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Ms. Lynn Albin
Washington State Department of Health
P.O. Box 7827
Olympia, WA 98504-7827

Ms. Christine Perrino (Mail Drop PE20)
Manager, Licensing
Energy Northwest
P.O. Box 968
Richland, WA 99352-0968

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
Harris Tower & Pavilion
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011-8064

Chairman
Benton County Board of Commissioners
P.O. Box 69
Prosser, WA 99350-0190

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 69
Richland, WA 99352-0069

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The staff's safety evaluation is enclosed. Based on the evaluation, the use of ASME approved Code Case N-528-1 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) in that the proposed alternative provides an acceptable level of quality and safety. The requirements of 10 CFR Part 21 are to be applied to the nuclear plant site supplying the material as well as to the nuclear plant site receiving the material that has been purchased, exchanged, or transferred between sites. Should Code Case N-528-1 be approved by reference in a future revision to Regulatory Guide (RG) 1.147 prior to the end of the licensee's second 10-year inservice inspection interval, the licensee must follow all provisions in Code Case N-528-1 with the limitations, if any, issued in RG 1.147, should the licensee intend to continue implementing the Code Case.

Sincerely,

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Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE SECOND 10-YEAR INSERVICE INSPECTION INTERVAL
RELIEF REQUEST 2ISI-25
ENERGY NORTHWEST
COLUMBIA GENERATING STATION
DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated November 2, 2001, as supplemented by letter dated September 10, 2002, Energy Northwest (the licensee), submitted a request for relief from the requirements imposed by the American Society of Mechanical Engineers (ASME) Code, Section XI, IWA-7210 for Columbia Generating Station (CGS).

2.0 BACKGROUND

Inservice inspection (ISI) of the ASME Code Class 1, 2 and 3 components is to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Section 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if the licensee demonstrates that (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2 and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. For CGS, the applicable edition of Section XI of the ASME Code for the second 10-year ISI interval is the 1989 Edition.

3.0 DISCUSSION

Relief Request 2ISI-25

System/Components for which Relief is Requested:

This request for relief proposes an alternative to the requirements of IWA-7000 when material meeting the definition in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites.

Applicable ASME Section XI Code Requirement:

Article IWA-7000 of the 1989 Edition of ASME Section XI contains the requirements for Code applicability of replacement items.

Code Requirement from which Relief is Requested:

Relief is requested from the requirements of IWA-7210 when material meeting the definition of "material" in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites.

Licensee's Basis for Requesting Relief: (as stated)

Code Case N-528-1 provides an alternative to the administrative requirements of Section III imposed by IWA-7210. Energy Northwest has reviewed the code case and has determined its implementation will substantially reduce non-beneficial work activities required by IWA-7000.

Licensee's Proposed Alternative: (as stated)

Energy Northwest will comply with the requirements of Code Case N-528-1 in lieu of IWA-7210 when material that meets the IWA-9000 definition of "material" is purchased, exchanged, or transferred between nuclear plant sites.

Licensee's Justification for Relief: (as stated)

The ASME Code Committee evaluated the proposed alternatives contained in Code Case N-528-1 and determined that they are acceptable for replacement activities involving material meeting the definition of IWA-9000. The code case requires that the material was originally procured in compliance with ASME Code, Section III requirements, maintained in conformance with an approved Appendix B program, and not subject to any operation that might affect the mechanical properties of the material. The implementation of Code Case N-528-1 will not affect the level of quality and safety nor decrease the margin of public health and safety. While the cost savings associated with Code Case N-528-1 have not been quantified as a Cost Beneficial Licensing Action item, its implementation is consistent with the intent to eliminate non-beneficial work

activities and their associated costs. Therefore, it is requested that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).

4.0 EVALUATION

The licensee proposes to comply with the requirements of ASME approved Code Case N-528-1 [Purchase, Exchange, or Transfer of Material Between Nuclear Plant Sites Section XI Division 1] in lieu of ASME Section XI Subarticle IWA-7210. Subarticle IWA-7210 requires that an item to be used for replacement meet the original Construction Code (Section III of the ASME Code) and existing design requirements. Code Case N-528-1 provides an alternative to the requirements of Section III imposed by IWA-7210, allowing material meeting the definition in IWA-9000 to be purchased, exchanged, or transferred between nuclear plant sites, provided certain requirements as listed in the Code Case are met.

In effect, the supplying plant fulfills the regulatory requirement for source evaluation by originally procuring the material and documentation in conformance with Section III of the Code and subsequently maintaining the material in accordance with its approved 10 CFR Part 50 Appendix B Quality Assurance Program.

The staff has evaluated Code Case N-528-1 as an acceptable alternative to certain administrative requirements of Section III when material is purchased, exchanged, or transferred between nuclear plant sites. The Code Case requires that the material was originally procured in compliance with ASME Code, Section III requirements, maintained in conformance with an approved Appendix B program, and not subject to any operation that might affect the mechanical properties of the material. The licensee is responsible for ensuring that the received documentation is complete and in compliance with Code requirements, that the material meets the design requirements for the intended application, and that the material conforms to the licensee's Appendix B program and all other regulatory requirements and commitments.

5.0 CONCLUSION

For Relief Request 2ISI-25, the staff finds that the licensee's proposed alternative provides an acceptable level of quality and safety. Therefore, the proposed alternative for relief request 2ISI-25 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the licensee's second ISI interval at Columbia Generating Station. Should Code Case N-528-1 be approved by reference in a future revision to Regulatory Guide (RG) 1.147 prior to the end of the licensee's second 10-year inservice inspection interval, the licensee must follow all provisions in Code Case N-528-1 with the limitations, if any, issued in RG 1.147, should the licensee intend to continue implementing the Code Case. The requirements of 10 CFR Part 21 are to be applied to the nuclear plant site supplying the material as well as to the nuclear plant site receiving the material that has been purchased, exchanged, or transferred between sites.

Principal Contributor: B. Benney

Date: November 18, 2002