October 22, 2002

Mr. John T. Conway
Site Vice President
Nine Mile Point Nuclear Station, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT NO. 1 - CORRECTION OF SAFETY EVALUATION (SE) FOR RISK-INFORMED INSERVICE INSPECTION PROGRAM (ISI) (TAC NO. MB4085)

Dear Mr. Conway:

On September 4, 2002, the Nuclear Regulatory Commission (NRC) staff authorized the subject alternative in response to your Relief Request ISI-22. Subsequent to that, your staff pointed out a typographical error in the NRC staff's safety evaluation (SE) supporting the alternative: on page 2, the second period of the third ISI interval was mistakenly stated as ending on December 25, 2005. The second period of the third ISI interval is to end on December 25, 2006, as is correctly stated on page 8 of the same SE.

Enclosed please find the corrected page 2 with a vertical line highlighting the correction. We apologize for any inconvenience this typographical error may have caused you.

Sincerely,

***/RA/***

Peter S. Tam, Senior Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-220

Enclosure: Corrected SE page

cc w/encl: See next page

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of quality and safety or if the specified requirement 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 set forth in the Code to the extent practical within the limitations of design, geometry, and materials of construction of the components.

The regulations require that ISI of components 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) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. For NMP1, and as stated in Section 1.0 above, the applicable edition of Section XI of the ASME Code for the third 10-year ISI interval, which began on December 26, 1999, and ends on December 25, 2009, is the 1989 edition. The licensee's relief request ISI-13 approved by the NRC states that the initial RI-ISI program will be implemented during the second period (December 26, 2002 to December 25, 2006) of the third 10-year ISI interval, starting with the seventeenth RFO of NMP1.

## 3.0 TECHNICAL EVALUATION

### 3.1 Summary of Proposed Approach

The licensee is required to perform ISI in accordance with the ASME Code, Section XI, which specifies that for each successive 10-year ISI interval, 100% of Category B-F welds and 25% of Examination Category B-J welds in Class 1 piping greater than 1 inch in nominal diameter be selected for volumetric and/or surface examination based on existing stress analyses and cumulative usage factors. For Examination Category C-F piping welds in Class 2 piping, 7.5% of non-exempt welds shall be selected for volumetric and/or surface examination.

The licensee proposed to use an RI-ISI program for a subset of ASME Class 1 and Class 2 piping (Examination Categories B-F, B-J, and C-F) welds, as an alternative to the ASME Code, Section XI requirements. The proposed RI-ISI program follows a previously approved RI-ISI methodology delineated in EPRI TR-112657 (Ref. 3).

The licensee stated in its revised August 14, 2002, letter that its Risk-Informed Inspection Program did not deviate from the EPRI methodology. In the original submittal (Ref. 1), the licensee identified a potential exception to the EPRI Methodology based on an ambiguity in the EPRI-TR. In Section 5.2 of its original submittal, the licensee stated that a typographical error exists on page 2-17, Section 2.3, of the EPRI-TR. The text of the EPRI-TR discussed by the licensee is shown below:

> For Flaws exceeding acceptance criteria (IWX-3500),
>
> - Increase the sample population to include those items scheduled for this and the next scheduled period,
> - If additional flaws are found in the expanded sample population, inspect all items of similar design, size, and function,
> - Remove, repair, replace or analytically evaluate,

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Unit No. 1

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