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SOUTHERN COMPANY
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November 1, 2002

Docket Nos. 50-321
50-366

HL-6317

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection (ISI) Program,
Revision of Relief Request RR-11

Ladies and Gentlemen:

ISI Relief Request RR-11 was submitted for NRC review in the initial Third 10-Year Interval ISI Program dated October 17, 1995. Subsequently, RR-11 was approved in a Safety Evaluation Report (SER) dated June 16, 1997. Relief Request RR-11 proposes an alternative to the ASME Section XI certification requirements for personnel performing snubber visual examinations. Southern Nuclear Operating Company (SNC) proposed that snubber visual examinations be performed by non-ASME XI certified maintenance personnel with specialized snubber training.

Changes within the nuclear industry have resulted in changes to the basis for relief contained in the original relief request. Some vendors previously relied upon to provide personnel training no longer provide such services. Therefore, SNC has been required to develop internal training modules to ensure that the quality of the training program does not diminish. These changes have resulted in more distinction for the training provided to maintenance personnel involved with snubber examinations and functional testing. The previous training program did not distinguish between personnel qualified to examine and those qualified to perform functional testing. The current program provides training for removal, installation, examination, repair, and overhaul of snubbers for selected maintenance personnel involved with the snubber program. However, only a limited number of these personnel are provided additional training for operation of the snubber functional testing equipment.

The personnel performing visual examinations still receive significantly more training directly related to snubbers than ASME Section XI requires for certification. Therefore, the quality of the examinations performed by trained maintenance personnel is equivalent or better than examinations performed by ASME Section XI certified individuals with only the normal training and experience. Additional training related to operation of the snubber test equipment does not add any additional benefit for personnel performing as-found visual examinations. Therefore, the distinction in training for these maintenance personnel does not affect the quality of the visual examinations.

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The changes incorporated in Relief Request RR-11 merely clarify that not all maintenance personnel who perform snubber visual examinations are also trained to operate the functional test equipment. Since the quality of the examinations being performed has not diminished, and the changes to RR-11 provide clarification only, SNC will continue with the existing process unless notified otherwise.

Should you have any questions in this regard, please contact this office.

Respectfully submitted,

H. L. Sumner, Jr.

IFL/eb

Enclosure: ISI Relief Request RR-11

cc: Southern Nuclear Operating Company
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SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.
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U.S. Nuclear Regulatory Commission, Region II
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Enclosure

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program,
ISI Relief Request RR-11

SOUTHERN NUCLEAR OPERATING COMPANY
PLANT HATCH, UNIT 1 & 2
THIRD 10-YEAR INTERVAL
REQUEST FOR RELIEF NO. RR-11

I. System/Component(s) for Which Relief is Requested: All ASME Class 1, 2, and 3 Snubbers included within the scope of the ISI Program.

II. Code Requirement: Section XI, IWF-5300 (a) and (c) require that visual examinations of snubbers and non-integral attachments (including lugs (non-integral), bolting, pins, and clamps) shall be examined by personnel certified to ASME Section XI VT-3 requirements.

III. Code Requirement from Which Relief is Requested: Relief is requested from using ASME Section XI qualified personnel to perform the Code-required visual examinations of snubbers and their associated non-integral attachments, including lugs, bolting, pins, and clamps.

IV. Basis for Relief: A selective group of Southern Nuclear Operating Company (SNC) Maintenance Department personnel receive special training for examination and/or testing of snubbers. This training includes specialized classes presented by various snubber vendors and contractors as well as internal training. The training includes identification of potential problems and deficient conditions relative to snubber operability. These classes include instructions in snubber repair and complete overhaul and some of these same maintenance personnel have been trained to operate the test equipment and perform snubber functional testing. This training also requires an annual eye examination equivalent to ASME Section XI, paragraph IWA-2321. These maintenance personnel have been far more involved and have accumulated many more hours of experience in activities associated with the removal, installation, examination, repair, overhaul, and testing of snubbers than a typical ASME Section XI VT-3 certified inspector.

The qualification of personnel will be in accordance with the SNC Quality Assurance Program for training and qualification of plant personnel. The subject maintenance personnel will have all such training documented to the training program requirements.

These IWF activities will be documented in the Site Snubber Program. Additionally, the SNC snubber examination procedures require that all examination data sheets be reviewed by the site snubber engineer for concurrence and resolution of any reported conditions.

(This Relief Request does not address the IWB, IWC, or IWD examinations which will be performed in accordance with Sub article IWA-2300, Qualifications of Nondestructive Examination Personnel.)

V. Alternate Examinations: Maintenance personnel who have been trained to recognize potential problems and deficient conditions specifically applicable to snubbers will be utilized to perform the snubber visual examinations required by IWF-5300 (a) and (c) and Table IWF-2500-1 (excluding welded attachments).

VI. Justification for the Granting of Relief: Utilization of SNC maintenance personnel who have been specifically trained to inspect, test, repair and overhaul snubber supports and who perform the examinations in conjunction with the Site Snubber Program will:

- eliminate a redundant inspection by VT-3 certified personnel, thus reducing man-power requirements, costs, and radiation exposure,
- provide examination by personnel with extensive experience in snubber applications and maintenance, and
- meet all aspects of IWF, other than the certification of inspection personnel.

These examinations of snubbers and the non-integral attachments will provide reasonable assurance that unallowable inservice flaws have not developed or that they will be detected and repaired prior to return of the reactor vessel to service. Thus an acceptable level of quality and safety will have been achieved and public health and safety will not be endangered by allowing the proposed alternative qualification of inspection personnel.

VII. Implementation Schedule: The subject examinations will be performed during the Third 10-Year Interval.

VIII. Relief Request Status: Relief initially granted in June 16, 1997 SER. SNC has revised and resubmitted RR-11 for NRC review.