

May 1, 2003

Mr. H. L. Sumner, Jr.
Vice President - Nuclear
Hatch Project
Southern Nuclear Operating
Company, Inc.
Post Office Box 1295
Birmingham, Alabama 35201-1295

SUBJECT: RELIEF REQUEST FOR THE THIRD 10-YEAR INSERVICE INSPECTION
PROGRAM RE: EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2
(TAC NOS. MB6732 AND MB6733)

By letter dated November 1, 2002, Southern Nuclear Operating Company, Inc., the licensee for Edwin I. Hatch Nuclear Plant, Units 1 and 2, submitted a revision to Relief Request RR-11, which had been previously submitted by letter dated October 17, 1995, and approved by letter dated June 16, 1997. Relief Request RR-11 proposes an alternative to the American Society of Mechanical Engineers (ASME) Section XI certification requirements for personnel performing snubber visual examinations. Specifically, the licensee's Relief Request RR-11 proposed that snubber visual examinations be performed by non-ASME Section XI certified maintenance personnel with specialized snubber training.

The staff has reviewed your request and the enclosed Safety Evaluation provides the results of the review. The staff finds that the licensee's alternative to the inservice inspection (ISI) requirements to ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition, Article IWF-5300(a) and (c), with regard to visual examination of snubbers, is authorized pursuant to the provisions of 10 CFR 50.55a(a)(3)(i) for the Third 10-Year ISI Interval. The staff's approval is based on the fact that the use of the selected qualified personnel for visual examination of snubbers provides an acceptable level of quality and safety.

Sincerely

/RA/

John A. Nakoski, Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-321 and 50-366

Enclosure: As stated

cc w/encl: See next page

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Distribution:

PUBLIC PDII-1 R/F JNakoski CHawes SBloom
BBonser, RII OGC ACRS

**See previous concurrence

*No major changes to SE.

ADAMS ACCESSION NO. ML031210644

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO THE THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM

SOUTHERN NUCLEAR OPERATING COMPANY, INC.

EDWIN I. HATCH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-321 AND 50-366

1.0 INTRODUCTION

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, requires that inservice inspection (ISI) of certain Code Class 1, 2, and 3 components be performed in accordance with Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code and applicable Edition and Addenda, except where specific written relief has been requested by the licensee and granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i), or alternatives approved pursuant to 10 CFR 50.55a(a)(3). In proposed alternatives, the licensee must demonstrate that: (i) the proposed alternatives provide an acceptable level of quality and safety; or (ii) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Section 50.55a authorizes the Commission to grant relief from ASME Code requirements upon making the necessary findings. The NRC staff's findings with respect to granting or not granting the relief request as part of the licensee's ISI program are contained in this Safety Evaluation (SE).

This SE covers a request for relief from the ASME B&PV Code, Section XI, Subarticle IWF-5300(a) and (c), inservice visual examination requirements. The licensee proposes an alternate visual examination method, as described in Relief Request RR-11, submitted by Southern Nuclear Operating Company's (SNC) letter dated November 1, 2002. This relief request is a revision of Relief Request RR-11, submitted by the licensee's letter dated October 17, 1995. The original relief request was approved by the NRC in an SE dated June 16, 1997.

The licensee's ISI program is based on the requirements of Section XI of the ASME B&PV Code, 1989 Edition. The 1989 Edition of the ASME B&PV Code, Section XI, Subarticles IWF-5300(a) and (c), requires that snubber inservice examinations be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4, published in 1988 (OM-1988, Part 4), using the VT-3 visual examination methods described in paragraph IWA-2213, "Visual Examinations VT-3."

The ASME Code, Section XI, requires personnel performing nondestructive examinations be qualified and certified as described in Subarticle IWA-2300.

2.0 TECHNICAL EVALUATION

2.1 Relief Request RR-11

The licensee requests relief from the ASME B&PV Code, Section XI, requirement to use certified personnel in the performance of the visual examination of snubbers and their attachments, excluding welded attachments, using the VT-3 methods described in paragraph IWA-2213.

Since the original Relief Request RR-11 was already approved, this relief request merely clarifies that selected maintenance personnel continue to receive adequate training through internal training modules. In addition, it clarifies that not all maintenance personnel who perform snubber visual examinations are also trained to operate the functional test equipment.

2.2 Licensee's Basis for Requested Relief

A selective group of SNC Maintenance Department personnel have received special training in the examination and/or testing of snubbers. The training consisted of specialized classes, presented by various snubber vendors and contractors as well as internal training. The training includes: (1) identification of potential problems and deficient conditions relative to snubber operability; (2) instructions in snubber repair and complete overhaul; and (3) training in performance of snubber functional testing. This training also requires an annual eye examination equivalent to ASME Section XI, Paragraph IWA-2321, "Visual Acuity." Individuals from the selected group 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.

Utilization of SNC maintenance personnel, specifically trained to inspect, test, repair and overhaul snubber supports to perform the visual examinations in conjunction with the Site Snubber Program will: (1) eliminate a redundant inspection by VT-3 certified personnel, thus reduce manpower requirements, costs, and radiation exposure; (2) provide examination by personnel with extensive experience in snubber applications and maintenance; (3) meet all aspects of Section XI, Article IWF requirements other than certification of inspection personnel; (4) provide reasonable assurance that unallowable inservice flaws have not developed or that they will be detected and repaired prior to returning the reactor vessel to service; and (5) provide an acceptable level of quality and safety and will not endanger public health and safety.

2.3 Proposed Alternative Method

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

2.4 Evaluation

Section XI, Subarticles IWF-5300(a) and (b), in part, require that ISI of snubbers and their integral and nonintegral attachments including lugs, bolting, pins, and clamps must be examined using the VT-3 visual examination method described in paragraph IWA-2213.

Paragraph IWA-2213, in part, requires that the VT-3 visual examination be conducted to determine the general mechanical and structural condition of components and their supports and include examinations for conditions that could affect operability or functional adequacy of snubbers and constant load or spring-type supports. Further, paragraph IWA-2321, in part, provides the personnel vision requirements and qualifications for VT-3 examiners.

The licensee stated that 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 maintenance personnel are provided additional training for operation of the snubber functional testing equipment.

Based on a consideration of: (1) the personnel performing visual examinations still receive significantly more training directly related to snubbers than ASME Section XI requires for certification; (2) the SNC Quality Assurance Program for training and qualification of plant personnel; and (3) the review of all examination data sheets by the site snubber engineer for concurrence and resolution of any reported conditions, the staff has determined that the proposed alternative is acceptable in that it will provide sufficient means to detect the condition of snubbers.

3.0 CONCLUSION

Based on the information provided, the staff determines that the licensee has presented an adequate justification for the requested relief from the requirements of the ASME Code, 1989 Edition, Section XI, Article IWF-5000 (which references OM-4), with regard to visual examination of Code Class 1, 2 and 3 snubbers. The staff concludes that the licensee's proposed alternative use of selected qualified personnel for the visual examination of snubbers would provide an acceptable level of quality and safety, and is acceptable. Therefore, Request for Relief No. RR-11 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the Third 10-Year ISI Interval.

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Date: May 1, 2003

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