November 21, 2003

Mr. Peter E. Katz
Vice President Nine Mile Point
Nine Mile Point Nuclear Station, LLC
P.O. Box 63
Lycoming, NY 13093

SUBJECT: NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2 (NMP1 AND NMP2) - AUTHORIZATION OF RELIEF REGARDING DISSIMILAR METAL PIPING WELDS (TAC NOS. MC0191 AND MC0192)

Dear Mr. Katz:

By letter dated August 8, 2003, and as revised by letter dated October 23, 2003, Nine Mile Point Nuclear Station, LLC (NMPNS), submitted the inservice inspection (ISI) Relief Requests ISI-24A and ISI-24B NMP1 and NMP2 for their current 10-year ISI interval. The application proposed using the dissimilar metal weld qualification criteria of the Electric Power Research Institute - Performance Demonstration Initiative (PDI) program in lieu of selected provisions of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Appendix VIII, Supplement 10.

The Nuclear Regulatory Commission (NRC) staff completed its review and determined that the proposed alternative to Supplement 10, as administered by the PDI program, will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the NRC staff authorizes the proposed alternative described in the above referenced letters, for NMP1 and NMP2, for their current 10-year ISI interval. If you have any questions, please contact the Project Manager, Mr. Peter S. Tam at 301-415-1451.

Sincerely,

/RA/

Richard J. Laufer, Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-220 and 50-410

Enclosure: As stated

cc w/encl: See next page

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Vice President Nine Mile Point
Nine Mile Point Nuclear Station, LLC
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Lycoming, NY 13093

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DISTRIBUTION:

PUBLIC	R. Laufer	S. Little	ACRS	G. Hill (2)	T. Chan
PDI-1 Reading File	P. TamC.	Bixler, RGI		OGC	Z. Fu

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*Safety evaluation transmitted by memo of 11/13/03.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

NINE MILE POINT NUCLEAR STATION, LLC (NMPNS)

DOCKET NOS. 50-220 AND 50-410

NINE MILE POINT NUCLEAR STATION, UNIT NOS. 1 AND 2 (NMP1 AND NMP2)

RELIEF REQUESTS ISI-24A AND ISI-24B

DISSIMILAR METAL PIPING WELDS

1.0 INTRODUCTION

By letter dated August 8, 2003, and as revised by letter dated October 23, 2003, NMPNS (the licensee) submitted the subject requests for relief for NMP1 and NMP2, for their current 10-year inservice inspection (ISI) interval. Specifically, the licensee's request for relief proposed using the dissimilar metal weld (DMW) qualification criteria of the Electric Power Research Institute (EPRI) - Performance Demonstration Initiative (PDI) program in lieu of selected provisions of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, Appendix VIII, Supplement 10.

2.0 REGULATORY EVALUATION

The ISI of the ASME Code Class 1, 2, and 3 components is to be performed in accordance with Section XI of the ASME Code and applicable edition and addenda as required by Title 10 of the *Code of Federal Regulations*, Part 50 (10 CFR 50), Subsection 55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). Furthermore, 10 CFR 50.55a(a)(3) states, in part, 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 (ISI) 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. The ISI Code of record for NMP1, third 10-year ISI interval, which began December 26, 1999, and NMP2, second 10-year ISI interval, which began April 5, 1998, is the 1989 Edition. The components (including supports) may meet the requirements set forth in subsequent editions and addenda of the ASME Code incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein and subject to commission approval.

3.0 TECHNICAL EVALUATION

The Nuclear Regulatory Commission (NRC) reviewed the licensee's application for relief. Details of the review are set forth below.

3.1 Components for Which Relief is Requested

Pressure retaining dissimilar metal piping welds subject to examinations using procedures, personnel, and equipment qualified to the 1995 Edition 1996 Addenda of the ASME Code, Section XI, Appendix VIII, Supplement 10, "Qualification Requirements for Dissimilar Metal Piping Welds."

3.2 Code Requirements

The licensee requested relief from the following requirements of the 1995 Edition with 1996 Addenda, ASME Code, Section XI, Appendix VIII, Supplement 10:

Item 1 - Paragraph 1.1 (b), which states, in part, that pipe diameters within a range of 0.9 to 1.5 times a nominal diameter shall be considered equivalent.

Item 2 - Paragraph 1.1 (d), which states that all flaws in the specimen set shall be cracks.

Item 3 - Paragraph 1.1(d)(1), which states that at least 50% of the cracks shall be in austenitic material; at least 50% of the cracks in austenitic material shall be contained wholly in weld or buttering material; at least 10% of the cracks shall be in ferritic material; the remainder of the cracks may be in either austenitic or ferritic material.

Item 4 - Paragraph 1.2(b), which states, in part, that the number of unflawed grading units shall be at least twice the number of flawed grading units.

Item 5 - Paragraphs 1.2(c)(1) and 1.3(c), which state, in part, that at least 1/3 of the flaws, rounded to the next higher whole number, shall have depths between 10% and 30% of the nominal pipe wall thickness. Paragraph 1.4(b) distribution table requires 20% of the flaws to have depths between 10% and 30%.

Item 6 - Paragraph 2.0, first sentence, which states that the specimen inside surface and identification shall be concealed from the candidate.

Item 7 - Paragraph 2.2(b), which states, in part, that the regions containing a flaw to be sized shall be identified to the candidate.

Item 8 - Paragraph 2.2(c), which states, in part, that for a separate length sizing test, the regions of each specimen containing a flaw to be sized shall be identified to the candidate.

Item 9 - Paragraph 2.3(a), which states that for the depth sizing test, 80% of the flaws shall be sized at a specific location on the surface of the specimen identified to the candidate.

Item 10 - Paragraph 2.3(b), which states that for the remaining flaws, the regions of each specimen containing a flaw to be sized shall be identified to the candidate. The candidate shall determine the maximum depth of the flaw in each region.

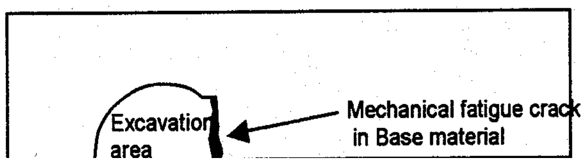
Item 11 - Table VIII-S2-1, which provides the false call criteria when the number of unflawed grading units is at least twice the number of flawed grading units.

3.3 <u>Licensee's Proposed Alternative</u>

The licensee proposed the following alternative (cited verbatim in indented paragraphs below) in lieu of selected paragraphs in the 1995 Edition with 1996 Addenda ASME Code, Section XI, Appendix VIII, Supplement 10, requirements for NMP1 and NMP2, during the current interval. The proposed alternative will be implemented through the PDI Program.

> Item 1 - The proposed alternative to Paragraph 1.1(b) states:
>
> "The specimen set shall include the minimum and maximum pipe diameters and thicknesses for which the examination procedure is applicable. Pipe diameters within a range of 1/2 in. (13 mm) of the nominal diameter shall be considered equivalent. Pipe diameters larger than 24 in. (610 mm) shall be considered to be flat. When a range of thicknesses is to be examined, a thickness tolerance of ± 25% is acceptable."
>
> Technical Basis - The change in the minimum pipe diameter tolerance from 0.9 times the diameter to the nominal diameter minus 0.5 inch provides tolerances more in line with industry practice. Though the alternative is less stringent for small pipe diameters, [these small pipes typically] have a thinner wall thickness than larger diameter piping. A thinner wall thickness results in shorter sound path distances that reduce the detrimental effects of the curvature. This change maintains consistency between Supplement 10 and the recent revision to Supplement 2.
>
> Item 2 - The proposed alternative to Paragraph 1.1(d) states:
>
> "At least 60% of the flaws shall be cracks, the remainder shall be alternative flaws. Specimens with IGSCC [intergranular stress corrosion cracking] shall be used when available. Alternative flaws, if used, shall provide crack-like reflective characteristics and shall be limited to the case where implantation of cracks produces spurious reflectors that are uncharacteristic of actual flaws. Alternative flaw mechanisms shall have a tip width of less than or equal to 0.002 in. (.05 mm). Note, to avoid confusion the proposed alternative modifies instances of the term "cracks" or "cracking" to the term "flaws" because of the use of alternative flaw mechanisms."

Technical Basis - As illustrated below, implanting a crack requires excavation of the base material on at least one side of the flaw. While this may be satisfactory for ferritic materials, it does not produce a useable axial flaw in austenitic materials because the sound beam, which normally passes only through base material, must now travel through weld material on at least one side, producing an unrealistic flaw response. In addition, it is important to preserve the dendritic structure present in field welds that would otherwise be destroyed by the implantation process. To resolve these issues, the proposed alternative allows the use of up to 40% fabricated flaws as an alternative flaw mechanism under controlled conditions. The fabricated flaws are isostatically compressed, which produces ultrasonic reflective characteristics similar to tight cracks.



Item 3 - The proposed alternative to Paragraph 1.1 (d)(1) states:

“At least 80% of the flaws shall be contained wholly in weld or buttering material. At least one and a maximum of 10% of the flaws shall be in ferritic base material. At least one and a maximum of 10% of the flaws shall be in austenitic base material.”

Technical Basis - Under the current [ASME] Code, as few as 25% of the flaws are contained in austenitic weld or buttering material. Recent experience has indicated that flaws contained within the weld are the likely scenarios. The metallurgical structure of austenitic weld material is ultrasonically more challenging than either ferritic or austenitic base material. The proposed alternative is therefore more challenging than the current [ASME] Code.

Item 4 - The proposed alternative to Paragraph 1.2(b) states:

“Detection sets shall be selected from Table VIII-S10-1. The number of unflawed grading units shall be at least one and a half times the number of flawed grading units.”

Technical Basis - Table VIII-S10-1 provides a statistically based ratio between the number of unflawed grading units and the number of flawed grading units. The proposed alternative reduces the ratio to 1.5 times to reduce the number of test samples to a more reasonable number from the human factors perspective. However, the statistical basis used for screening personnel and procedures is still maintained at the same level with competent personnel being successful and less skilled personnel being unsuccessful. The acceptance criteria for the statistical basis are in Table VIII-S10-1.

Item 5 - The proposed alternative to the flaw distribution requirements of Paragraph 1.2(c)(1) (detection) and 1.3(c) (length) is to use the Paragraph 1.4(b) (depth) distribution table (see below) for all qualifications.

Flaw Depth (% Wall Thickness)	Minimum Number of Flaws
10-30%	20%
31-60%	20%
61-100%	20%

Technical Basis - The proposed alternative uses the depth sizing distribution for both detection and depth sizing because it provides for a better distribution of flaw sizes within the test set. This distribution allows candidates to perform detection, length, and depth sizing demonstrations simultaneously utilizing the same test set. The requirement that at least 75% of the flaws shall be in the range of 10 to 60% of wall thickness provides an overall distribution tolerance yet the distribution uncertainty decreases the possibilities for testmanship that would be inherent to a uniform distribution. It must be noted that it is possible to achieve the same distribution utilizing the present requirements, but it is preferable to make the criteria consistent.

Item 6 - The proposed alternative to Paragraph 2.0 first sentence states:

“For qualifications from the outside surface, the specimen inside surface and identification shall be concealed from the candidate. When qualifications are performed from the inside surface, the flaw location and specimen identification shall be obscured to maintain a “blind test”.”

Technical Basis - The current Code requires that the inside surface be concealed from the candidate. This makes qualifications conducted from the inside of the pipe (e.g., PWR [pressurized-water reactor] nozzle to safe end welds) impractical. The proposed alternative differentiates between ID [inner diameter] and OD [outer diameter] scanning surfaces, requires that they be conducted separately, and requires that flaws be concealed from the candidate. This is consistent with the recent revision to Supplement 2.

Items 7 and 8 - The proposed alternatives to Paragraph 2.2(b) and 2.2(c) state:

“... containing a flaw to be sized may be identified to the candidate.”

Technical Basis - The current Code requires that the regions of each specimen containing a flaw to be length Zsized shall be identified to the candidate. The candidate shall determine the length of the flaw in each region (Note, that length and depth sizing use the term “regions” while detection uses the term “grading units” - the two terms define different concepts and are not intended to be equal or interchangeable). To ensure security of the samples, the proposed alternative modifies the first “shall” to a “may” to allow the test administrator the option of not identifying specifically where a flaw is located. This is consistent with the recent revision to Supplement 2.

Items 9 and 10 - The proposed alternative to Paragraph[s] 2.3(a) and 2.3(b) state[s]:

“... regions of each specimen containing a flaw to be sized may be identified to the candidate.”

Technical Basis - The current [ASME] Code requires that a large number of flaws be sized at a specific location. The proposed alternative changes the “shall” to a “may” which modifies this from a specific area to a more generalized region to ensure security of samples. This is consistent with the recent revision to Supplement 2. It also incorporates terminology from length sizing for additional clarity.

Item 11 - The proposed alternative modifies the acceptance criteria of Table VIII-S2-1 as follows:

TABLE VIII-S~~2~~ 10 -1
PERFORMANCE DEMONSTRATION DETECTION TEST ACCEPTANCE CRITERIA

Detection Test Acceptance Critera		False Call Test Acceptance Criteria	
No. of Flawed Grading Units	Minimum Detection Criteria	No. of Unflawed Grading Units	Maximum Number of False Calls
~~5~~	~~5~~	~~10~~	~~0~~
~~6~~	~~6~~	~~12~~	~~1~~
~~7~~	~~6~~	~~14~~	~~1~~
~~8~~	~~7~~	~~16~~	~~2~~
~~9~~	~~7~~	~~18~~	~~2~~
10	8	~~20~~ 15	~~3~~ 2
11	9	~~22~~ 17	~~3~~ 3
12	9	~~24~~ 18	~~3~~ 3
13	10	~~26~~ 20	~~4~~ 3
14	10	~~28~~ 21	~~5~~ 3
15	11	~~30~~ 23	~~5~~ 3
16	12	~~32~~ 24	~~6~~ 4
17	12	~~34~~ 26	~~6~~ 4
18	13	~~36~~ 27	~~7~~ 4
19	13	~~38~~ 29	~~7~~ 4
20	14	~~40~~ 30	~~8~~ 5

Technical Basis - The proposed alternative is identified as new Table VIII-S10-1 above. It was modified to reflect the reduced number of unflawed grading units and allowable false calls. As a part of ongoing [ASME] Code activities, Pacific Northwest National Laboratory has reviewed the statistical significance of these revisions and offered the revised Table VIII-S10-1.

3.3 Evaluation

The licensee proposed to use the program developed by PDI that is similar to the Code requirements. The differences between the Code and the PDI program are discussed below.

Paragraph 1.1(b)

The Code requirement of “0.9 to 1.5 times the nominal diameter are equivalent” was established for a single nominal diameter. When applying the Code-required tolerance to a range of diameters, the tolerance rapidly expands on the high side. Under the current Code requirements, a 5-inch OD pipe would be equivalent to a range of 4.5-inch to 7.5-inch diameter pipe. Under the proposed PDI guidelines, the equivalent range would be reduced to 4.5-inch to 5.5-inch diameter pipe. With current Code requirements, a 16-inch nominal diameter pipe would be equivalent to a range of 14.4-inch to 24-inch diameter pipe. The proposed alternative would significantly reduce the equivalent range to between 15.5-inch to 16.5-inch diameter pipe. The difference between Code and the proposed alternative for diameters less than 5 inches is not significant because of shorter metal path and beam spread associated with smaller diameter piping. The licensee’s proposed alternative is considered more conservative overall than current Code requirements. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

Paragraph 1.1(d)

The Code requires all flaws to be cracks. Manufacturing test specimens containing cracks free of spurious reflections and telltale indicators is extremely difficult in austenitic material. To overcome these difficulties, PDI developed a process for fabricating flaws that produce ultrasonic testing acoustic responses similar to the responses associated with real cracks. PDI presented its process for discussion at public meetings held June 12 through 14, 2001, and January 31 through February 2, 2002, in Charlotte, North Carolina. The NRC staff attended these meetings and determined that the process parameters used for manufacturing fabricated flaws resulted in acceptable acoustic responses. PDI is selectively installing these fabricated flaws in specimen locations that are unsuitable for real cracks. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

Paragraph 1.1(d)(1)

The Code requires that at least 50% of the flaws be contained in austenitic material, and 50% of the flaws in the austenitic material shall be contained fully in weld or buttering material. This means that at least 25% of the total flaws must be located in the weld or buttering material. Field experience shows that flaws identified during ISI of dissimilar metal welds are more likely to be located in the weld or buttering material. The grain structure of austenitic weld and buttering material represents a much more stringent ultrasonic scenario than that of a ferritic material or austenitic base material. Flaws made in austenitic base material are difficult to create free of spurious reflectors and telltale indicators. The proposed alternative of 80% of the flaws in the weld metal or buttering material provides a challenging testing scenario reflective of field experience and minimizes testmanship associated with telltale reflectors common to placing flaws in austenitic base material. The NRC staff considers the proposed alternative to be more conservative than current ASME Code requirements. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

Paragraph 1.2(b) and Paragraph 3.1

The Code requires that detection sets meet the requirements of Table VIII-S2-1 which specifies the minimum number of flaws in a test set to be 5 with 100% detection. The current Code also requires the number of unflawed grading units to be two times the number of flawed grading units. The proposed alternative would follow the detection criteria of the table beginning with a minimum number of flaws in a test set being 10, and reducing the number of false calls to one and a half times the number of flawed grading units. The changes to Table VIII-S2-1 are shown in Table VIII-S10-1 (reproduced on page 6). The NRC staff agrees that the proposed alternative satisfies the pass/fail objective established for Appendix VIII performance demonstration acceptance criteria. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

Paragraph 1.2(c)(1) and 1.3(c)

For detection and length sizing, Code requires at least 1/3 of the flaws be located between 10 and 30% through the wall thickness and 1/3 located greater than 30% through the wall thickness. The remaining flaws would be located randomly throughout the wall thickness. The proposed alternative sets the distribution criteria for detection and length sizing to be the same as the depth sizing distribution, which stipulates that at least 20% of the flaws be located in each of the increments of 10-30%, 31-60%, and 61-100%. The remaining 40% would be located randomly throughout the wall thickness. With the exception of the 10-30% increment, the proposed alternative is a subset of the current Code requirements. The 10-30% increment would be in the subset if it contained at least 30% of the flaws. The change simplifies assembling test sets for detection and sizing qualifications and is more indicative of conditions in the field. The alternative requirements are as stringent as those in the Code; accordingly, the NRC staff determines that the alternative requirements will provide an acceptable level of quality and safety, and are, therefore, acceptable.

Paragraph 2.0

The Code requires the specimen inside surface be concealed from the candidate. This requirement is applicable for test specimens used for qualification performed from the outside surface. With the expansion of Supplement 10 to include qualifications performed from the inside surface, the inside surface must be accessible while maintaining the specimen integrity. The proposed alternative requires that flaws and specimen identifications be obscured from candidates, thus maintaining blind test conditions. It is noted that these welds for boiling-water water reactors are normally examined from their reactor pressure vessel outside surface. The NRC staff considers this to be consistent with the intent of ASME Code requirements. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

Paragraph 2.2(b) and 2.2(c)

The Code requires that the location of flaws added to the test set for length sizing shall be identified to the candidate. The proposed alternative is to make identifying the location of additional flaws an option. This option provides an additional element of difficulty to the testing process because the candidate would be expected to demonstrate the skill of detecting and sizing flaws over an area larger than a specific location. The NRC staff considers the proposed alternative to be more conservative than current ASME Code requirements. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

Paragraph 2.3(a)

The Code requires that 80% of the flaws be sized in a specific location that is identified to the candidate. The proposed alternative permits detection and depth sizing to be conducted separately or concurrently. In order to maintain a blind test, the location of flaws cannot be shared with the candidate. For depth sizing that is conducted separately, allowing the test administrator the option of not identifying flaw locations makes the testing process more challenging. The NRC staff considers the proposed alternative to be more conservative than current ASME Code requirements. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

Paragraph 2.3(b)

The Code requires that the location of flaws added to the test set for depth sizing shall be identified to the candidate. The proposed alternative is to make identifying the location of additional flaws an option. This option provides an additional element of difficulty to the testing process because the candidate would be expected to demonstrate the skill of finding and sizing flaws in an area larger than a specific location. The NRC staff considers the proposed alternative to be more conservative than current ASME Code requirements. The NRC staff finds that the proposed alternative will provide an acceptable level of quality and safety and, therefore, is acceptable.

4.0 CONCLUSION

The NRC staff determined that the proposed alternative to Supplement 10, as administered by the PDI program, will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the NRC staff authorizes the proposed alternative described in the licensee's letter dated August 8, 2003, and as revised by letter dated October 23, 2003, for NMP1 and NMP2, for their current 10-year ISI interval. All other ASME Code, Section XI requirements for which relief was not specifically requested and approved in this relief request remain applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: Z. Fu

Date: November 21, 2003

cc:

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 126
Lycoming, NY 13093

Supervisor
Town of Scriba
Route 8, Box 382
Oswego, NY 13126

Mr. James R. Evans
LIPA
P.O. Box 129
Lycoming, NY 10393

Charles Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, NY 10271

Mr. Paul D. Eddy
Electric Division
NYS Department of Public Service
Agency Building 3
Empire State Plaza
Albany, NY 12223

C. Adrienne Rhodes
Chairman and Executive Director
State Consumer Protection Board
5 Empire State Plaza, Suite 2101
Albany, NY 12223-1556

Mark J. Wetterhahn, Esquire
Winston & Strawn
1400 L Street, NW
Washington, DC 20005-3502

Mr. Michael J. Wallace
President
Nine Mile Point Nuclear Station, LLC
c/o Constellation Energy Group, Inc.
750 East Pratt Street
Baltimore, MD 21202

Mr. James M. Petro, Jr., Esquire
Counsel
Constellation Energy Group
750 East Pratt Street, 5th Floor
Baltimore, MD 21202

Mr. William M. Flynn, President
New York State Energy, Research, and
Development Authority
17 Columbia Circle
Albany, NY 12203-6399