

April 15, 2005

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

SUBJECT: COLUMBIA GENERATING STATION - AMERICAN SOCIETY OF  
MECHANICAL ENGINEERS INSERVICE INSPECTION PROGRAM RELIEF  
REQUESTS 2ISI-31, SUBSEQUENT ASME SECTION XI EDITION AND  
ADDENDA FOR PRESSURE TESTING (TAC NO. MC5851)

Dear Mr. Parrish:

By letter dated February 4, 2005, Energy Northwest, the licensee for Columbia Generating Station, submitted inservice inspection (ISI) Relief Request 2ISI-31 for its current 10-year ISI interval. The application proposed using a portion of a subsequent Edition of the ASME Section XI Code and Addenda for pressure testing Code Category C-H items.

The staff completed its review of Relief Request 2ISI-31, which proposed using a portion of the subsequent Edition of ASME Section XI, 2001 Edition, 2003 Addenda, Table IWC-2500-1, for examination category C-H components. The staff concluded that all related requirements are met, therefore, pursuant to 10 CFR 50.55a(g)(4)(iv), the staff approves the use of Relief Request 2ISI-31, for the Columbia Generating Station, for the remainder of its second 10-year ISI interval.

Sincerely,

***/RA By J.Donohew for R.Gramm/***

Robert Gramm, Chief, Section 2  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: As stated

cc w/encl: See next page

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DATE	4/5/05	4/5/05	3/15/05	4/8/05	4/8/05

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO RELIEF REQUEST NUMBERS 2ISI-31

ENERGY NORTHWEST

COLUMBIA GENERATING STATION

DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated February 4, 2005, Energy Northwest (EN, licensee), submitted Relief Request Number 2ISI-31, requesting approval to use a portion of a subsequent year and Addenda of the American Society of Mechanical Engineers (ASME) Code, Section XI, at the Columbia Generating Station (CGS). Relief Request 2ISI-31 would authorize the use of ASME Section XI, 2001 Edition, 2003 Addenda, Table IWC-2500-1 for examination category C-H components. The relief request would be for the remaining portion of the second inservice inspection (ISI) interval at the CGS.

2.0 REGULATORY EVALUATION

Alternatives to requirements may be authorized or relief granted by the Nuclear Regulatory Commission (NRC) pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(a)(3)(i), 50.55a(a)(3)(ii), or 50.55a(g)(6)(i). In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for the facility. Pursuant to 10 CFR 50.55a(g)(4)(iv), ISI items may meet the requirements set forth in subsequent Editions and Addenda of the ASME Code that are incorporated by reference in 10 CFR 50.55a(b), subject to the limitations and modifications listed therein, and subject to Commission approval. Portions of Editions and Addenda may be used provided that related requirements of the respective Editions and Addenda are met.

The licensee submitted Relief Request 2ISI-31, pursuant to 10 CFR 50.55a(g)(4)(iv), as a proposed alternative to the implementation of ASME Code, Section XI, 1989 Edition with no Addenda for pressure retaining components for a Class 2 portion of the standby liquid control piping for the remaining portion of the second ISI interval for the CGS.

3.0 TECHNICAL EVALUATION - RELIEF REQUEST 2ISI-30

3.1 Code Requirements for which Relief is Requested

The CGS uses ASME Code, Section XI, 1989 Edition with no Addenda.

### 3.1.1 System/Component(s) for which Relief is Requested

All ASME Class 2 pressure retaining components.

### 3.2 Licensee's Proposed Alternative and Bases

The licensee proposes to use ASME Code, Section XI, 2001 Edition, 2003 Addenda, Table IWC-2500-1, Examination Category C-H and all related requirements, incorporated by reference in 10 CFR 50.55a(b), and the *Federal Register*, October 1, 2004, (69 FR 58804). The licensee requests the use of the later edition of the ASME Code pursuant to 10 CFR 50.55a(g)(4)(iv) and that all related requirements including limitations identified in 10 CFR 50.55a are to be met.

### 3.3 Staff Evaluation

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) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein.

Pursuant to 10 CFR 50.55a(g)(4)(iv), inservice examination of components and system pressure tests may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in paragraph (b) of this section, subject to the limitations and modifications listed in paragraph (b) of this section, and subject to Commission approval. Portions of Editions or Addenda may be used provided that all related requirements of the respective Editions and Addenda are met.

The ASME Code, Section XI, 2001 Edition with Addenda through 2003, was incorporated by reference into 10 CFR 50.55a(b) on November 1, 2004. The NRC staff's position regarding the use of the above code has been published in the *Federal Register* on October 1, 2004, (69 FR 58804) subject to certain limitations and modifications. By letter dated February 4, 2005, the licensee submitted Relief Request 2ISI-31, which requested NRC approval, under the terms of 10 CFR 50.55a(g)(4), to apply the ASME Code, Section XI, 2001 Edition with Addenda through 2003, to the second ISI interval for the CGS.

When using portions of later editions and addenda of the Code, all related requirements including limitations identified in 10 CFR 50.55a are to be met. Under 10 CFR 50.55a, three limitations are identified in 10 CFR 50.55a(b)(2) for pressure testing:

1. (xx) - This provision defines hold times for Code Class 2 and 3 system leakage tests when performed in accordance with IWA-5213(a) from 1997 through the 2002 Addenda. The staff agrees that this limitation does not apply since the licensee will be performing the pressure test in accordance with the 2001 Edition through the

2003 Addenda of the ASME Code.

2. (xxvi) - This provision defines pressure testing of mechanical joints during repair and replacement activities. The staff agrees that since this request does not include repair and replacement activities, this limitation is not applicable.
3. (xxvii) - This provision addresses insulation removal with pressure testing Code Class 1 borated systems. The CGS is a boiling water reactor and does not have Code Class 1 borated systems. The staff agrees this limitation is not applicable to this request.

In addition, the licensee stated the following related requirements from ASME Code, Section XI, 2001 Edition, 2003 Addenda as applicable to Examination Category C-H, would be implemented:

1. IWB-5220 System Leakage Test
2. Examination Method - VT-2
  - a) IWA-2212 VT-2 Examination
  - b) IWA-2300 Qualifications of Nondestructive Examination Personnel
  - c) IWA-5000 System Pressure Tests
3. Acceptance Standard
  - a) IWC-3516 Standards for Examination Category C-H; since these standards are in the course of preparation, IWB-3522 will be applied.
  - b) IWB-3522 Acceptance for Examination Category C-H Components
  - c) IWB-3142 Acceptance
  - d) IWA-5250 Corrective Action
  - e) IWA-5240 Visual Examinations

The staff concludes that the licensee has committed to complying with the related requirements and limitations pertaining to implementation of the pressure testing of Class 2 pressure retaining components under ASME Section XI, 2001 Edition, 2003 Addenda, as applicable to Examination Category C-H, and the request for relief under 2ISI-31 for CGS is acceptable.

#### 4.0 CONCLUSION

Based on the above review, the staff concludes that the use of ASME Code, Section XI, 2001 Edition, 2003 Addenda, Table IWC-2500-1, for Examination Category C-H components, is acceptable. Therefore, pursuant to 10 CFR 50.55a(g)(4)(iv), the staff approves for use the portion of a later Edition of the ASME Code as submitted under Relief Request 2ISI-31, and all related requirements, for the remainder of the second ISI interval at CGS.

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: T. K. Steingass

Date: April 15, 2005

Columbia Generating Station

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