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New York Power Authority

James Knubel
Senior Vice President and
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November 3, 1997
IPN-97-151

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

Subject: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Request for Relief from 1992 Edition ASME Section XI, Subsection IWA

Reference: NRC Letter to NYPA, "Relief Request from the Implementation of 10 CFR 50.55a Requirements Related to the Repair and Replacement Activities for the Containment of the Indian Point Nuclear Generating Unit No. 3 (TAC M98061)", dated July 8, 1997.

Dear Sir:

This letter requests relief from the 1992 Edition of ASME Section XI, Subsection IWA, as evoked by 10 CFR 50.55a. This request is consistent with the relief granted previously in the above reference. The requirements of the 1992 Edition of the ASME Code were incorporated into 10 CFR 50.55a and became effective September 9, 1996. The attached request for relief (Attachment I) is submitted pursuant to 10 CFR 50.55a(a)(3)(ii) and applies for the remainder of the 2nd 10-year interval, which currently expires on July 21, 1999.

Commitments made by the Authority in this letter are listed on Attachment II. An accelerated review and approval is requested for this matter. If you have any questions, please contact Ms. C. Faison.

Very truly yours,

J. Knubel
Senior Vice President &
Chief Nuclear Officer

Attachments: as stated
cc: next page

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Attachment I to IPN-97-151

Request for Relief from 1992 Edition ASME Section XI, Subsection IWA

New York Power Authority

INDIAN POINT 3 NUCLEAR POWER PLANT
Docket No. 50-286
DPR-64

Request for Relief from 1992 Edition ASME Section XI, Subsection IWA

System/Components for Which Relief is Requested:

ASME Code Class MC (Metal Containments) and CC (Concrete Containments) Structures, Systems, and Components.

ASME Section XI Code Requirement:

1992 Edition ASME Section XI, Subsections IWA, IWE and IWL include general and specific requirements for inspection, repair and replacement for ASME Code Class MC and CC structures, systems and components.

Code Requirements for Which Relief is Requested:

Relief is requested from the use of ASME Section XI, 1992 Edition, Subsection IWA, "General Requirements".

Proposed Alternative Requirements:

The general requirements of Subsection IWA, including examiner qualification details, will conform to the 1983 Edition of the ASME Section XI Code, including Summer 1983 Addenda. These are the same general requirements that apply for all other components in the Inservice Inspection (ISI) program. Containment repair/ replacement and Inservice Inspections will conform to Subsections IWE and IWL of the 1992 Edition of the ASME Section XI Code.

The National Board of Boilers and Pressure Vessels authorized inspector assigned to IP3 will be considered acceptable for inspection of containment examinations, repairs and replacements, and the inspector qualification requirement shall be in accordance with ASME N626 as stated in the 1983 Edition of ASME Section XI Code. For containment pressure boundary concrete inspections and repair/replacement activities, inspections will be performed by inspection personnel who have attended specific concrete inspection training supervised by the Responsible Concrete Engineer (who is either a registered Professional Engineer or under the direction of a registered Professional Engineer), and an additional review by an Authorized Nuclear Inservice Inspector with concrete repair experience or concrete endorsement (C-endorsement) certification shall be required.

Basis for Relief Request:

The current Indian Point 3 (IP3) ISI program for Class 1, 2, and 3 components and their supports is based on ASME Section XI, 1983 Edition including the 1983 Summer Addenda. However, for Inservice Inspections, repair and replacement of Class MC and CC structures, systems and components, the rules of the 1992 Edition of ASME Code, Subsections IWA, IWE, and IWL apply. The classification of systems and their components is based on requirements in 10CFR50.55(a) and NRC Regulatory Guide 1.26. The IP3 ISI program defines the general requirements and includes all factors necessary to assure that ISI activities are performed to the highest quality levels (in accordance with the 1983 Section XI and 1980 Edition of ASNT SNT-TC-1A). The imposition of 1992 ASME Code general requirements of Subsection IWA for containment repair/replacement and Inservice Inspection activities would necessitate a separate administrative program including procedures, certification tests and record keeping requirements, which would merely parallel the existing program with no benefit to quality. The existing program is the same as used on the reactor vessel and other Class 1 components, and continues to prove effective. Implementing and maintaining two separate administrative programs, one for Class 1, 2, & 3 systems and components, and another just for Class MC and CC structures, systems and components is a significant burden to the Authority, and would not provide a compensatory increase in the level of quality and safety.

For authorized Inservice Inspection, the third party inspection agency has a very limited number of inspectors who are qualified for concrete inspection (C-endorsement). The Authority understands that this is an industry-wide situation.

Justification for Granting of Relief:

Currently repair/replacement of Code Class 1, 2, and 3 systems and components are performed in accordance with the rules of the 1983 Edition including Summer Addenda, and Code Class MC and CC components repair/replacements are performed to the 1992 Edition requirements. Using the IWA general requirements of the 1983 Edition will not compromise the quality and safety standards of containment repair/replacement activities. All repair/replacement activities, including those for the containment, are controlled by administrative and implementation procedures. The following are examples of these procedures:

A) Modification Control Manual Procedures which control the engineering and design processes of plant modifications, such as:

- MCM-3, Modification Package Preparation, Review and Approval
- MCM-4, Nuclear Safety and Environmental Impact Screens and Nuclear Safety Evaluations
- MCM-5, Minor Modifications
- MCM-7, Parts and Material Substitutions
- MCM-14, Type 1 Change (IP3)

B) Station Administrative Procedures (AP) and Administrative Directives (AD) which establish control on the planning, work control, quality assurance, and implementation of work packages associated with the repair/replacement activities, such as:

- AP-9, Work Control
- AP-12, Modifications
- AP-16, Quality Assurance Program
- AP-39, IP3 ASME Section XI Repair/Replacement Program
- SED-AD-24, Technical Evaluation of Components and Replacement Items

These procedures, together with other lower level implementation procedures, ensure any containment repair/replacement activities meet or exceed the original design criteria. Authority QA personnel are also involved with containment related inspection and repair/replacement activities. Imposition of the 1992 IWA general requirements would necessitate the duplication of a significant portion of the existing procedural controls identified above. Hence, requiring redundant administrative programs to meet the 1992 IWA general requirements (e.g., visual examiner qualifications, record keeping, etc.) for containment inspection and repair/replacement (Class MC and CC) activities in parallel with the existing ISI program for all other ISI components is a significant burden that has no benefit to quality and safety.

Current examination requirements for containment related repair/replacement activities in many cases are actually more stringent than are required under the provisions of 1992 IWE (VT-1 or VT-3, as defined in 1992 ASME Section XI, Subsection IWA). For example, during the recent outage (R09), the Service Water piping/containment penetration modification required both visual and surface examinations be performed for the welds under the Construction Code of ANSI B31.1-1967. These repaired/replaced components, in conjunction with the containment, are also periodically tested in accordance with 10 CFR 50 Appendix J requirements to ensure containment integrity.

An annual inspection of the containment structure is performed in accordance with the IP3 Technical Specifications. Deficiencies identified during the inspections are resolved in accordance with the corrective action program. No significant degradation of containment integrity has been detected. Additionally, the Authority has implemented the following actions toward the development and implementation of a containment repair/replacement program which will further assure the integrity of the containment:

- AP-39, IP3 ASME Section XI Repair/Replacement Program, has been revised to include Code Class MC and CC structures, systems, and components.

- Affected ISI drawings have been revised to show the updated boundaries which encompass the Class MC and CC components. Any piping, valves, and pumps which penetrate or are part of the containment boundary have been upgraded to at least ISI Class 2.

- Training classes were given by the Engineering Programs Group ISI Coordinator and the Maintenance Engineering Repair/Replacement Coordinator to affected individuals, i.e., work package planners, QA engineers, civil/structural engineers, Performance Engineers, etc. on the containment repair/replacement requirements, and the resulting changes to the Section XI boundaries.

- Action items have been generated and assigned to responsible individuals to incorporate the requirements of IWE/IWL into the IP3 ISI program, and to complete all the required containment inspections by September 2001.

- A walkdown and video taping of the inside exposed surfaces of the containment was performed during R09 to prepare for the general visual inspection to be performed during R10.

- A concrete inspection program and associated procedures are being developed.

- Specific concrete inspection training will be given to inspection personnel performing containment concrete inspections. The Authority's inspectors already have similar experience in the inspection of reinforced concrete in the area of base plate supports.

- The position and responsibilities of the responsible Concrete Engineer on containment concrete repair/replacement have been established by procedure.

Implementing procedures for all applicable portions of Subsections IWA, IWE and IWL will be in accordance with the Authority's Quality Assurance Program, which meets 10 CFR 50 Appendix B.

Using the IWA general requirements of the 1983 Edition of the ASME Section XI Code will not compromise the quality and standard of containment inspection or repair/replacement activities, and therefore will not compromise the structural integrity of the containment, and is consistent with maintaining the continued health and safety of the public.

The programs, procedures, and personnel the Authority has in place will ensure all containment repair/replacement activities, as well as any associated preservice and inservice inspections performed, are properly controlled and will not have any adverse effect on the containment integrity.

Implementation Schedule

This relief will be implemented during the 2nd 10-year inspection interval.

Attachment II to IPN-97-151

Commitment List

Commitment Number	Commitment	Due Date
IPN-97-151-1	Implement proposed alternative inspection requirements identified in relief request.	No more than 180 days following granting of relief
IPN-97-151-2	Incorporate the requirements of IWE/IWL into the IP-3 ISI program.	12/31/98
IPN-97-151-3	Complete all required containment inspections by September 2001.	9/30/01

New York Power Authority

INDIAN POINT 3 NUCLEAR POWER PLANT
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