

Indian Point 3
Nuclear Power Plant
P.O. Box 215
Buchanan, New York 10511
914 736.8003



Mr. Fred R. Dacimo
Plant Manager

August 18, 1999
IPN-99-088

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

SUBJECT: Indian Point 3 Nuclear Power plant
Docket No. 50-286
License No. DPR-64
Relief Request for Reactor Vessel Nozzle Inspections

Reference: 1. WCAP-15262, Revision 0, "Technical Basis for Elimination of Reactor Vessel Nozzle Inner Radius Inspections, Indian Point Unit 3," July 1999.

Dear Sir:

The purpose of this letter is to request the NRC to grant relief from the examination requirements of ASME Code Section XI, 1983 Edition, Summer Addendum, Subsection IWB, Table IWB 2500-1, Examination Category B-D, Item No. B 3.100, pursuant to the provisions of 10 CFR 50.55a(a)(3). Table IWB 2500-1, Item No. B 3.100 requires that volumetric examination shall be performed on the inner radius section of the reactor vessel nozzle during each inspection interval.

The Authority requests relief from the examination requirements for the reactor vessel nozzle inner radius section for both the inlet and outlet nozzle regions. The relief request is included in Attachment I. The technical basis for the relief request is provided in Reference 1, "WCAP-15262, Revision 0, Technical Basis for Elimination of Reactor Vessel Nozzle Inner Radius Inspections, Indian Point Unit 3," July 1999 (Attachment II). This report demonstrates that it is highly unlikely that the reactor vessel nozzles would fail under any anticipated service conditions. The inspection is difficult to perform because of the complex geometry of the areas to be inspected. Compliance with the Code requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Approval of this relief request will allow the Authority to eliminate up to 10 hours from the critical path activities during the upcoming refueling outage (RO) 10.

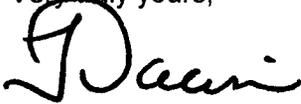
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The Authority respectfully requests that this relief be granted by September 10, 1999. Approval of the relief request by this date will facilitate its implementation for the In-service Inspection activities that are scheduled to be performed in RO 10. RO 10 is scheduled to start on September 10, 1999. The Authority would be happy to meet with members of the NRC staff to discuss this request in detail.

The Authority is not making any new commitments in this submittal. If you have any questions, please contact Mr. Ken Peters at 914-736-8029.

Very truly yours,



Fred Dacimo
Plant Manager

Attachments: as stated

cc: Mr. Hubert J. Miller
Regional Administrator
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U.S. Nuclear Regulatory Commission
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Resident Inspector's Office
Indian Point Unit 3
U.S. Nuclear Regulatory Commission
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Mr. George F. Wunder, Project Manager
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ATTACHMENT I TO IPN-99-088
RELIEF REQUEST FOR REACTOR VESSEL
NOZZLE INSPECTIONS

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

INDIAN POINT 3 NUCLEAR POWER PLANT
SECOND TEN YEAR IN-SERVICE INSPECTION INTERVAL
RELIEF REQUEST

A. COMPONENT IDENTIFICATION

Class: 1
Identification of System: Reactor Coolant System
Description of Components: Reactor Vessel Inlet and Outlet Nozzles Inner Radius Sections

B. EXAMINATION REQUIREMENTS

1983 ASME Section XI, 1983 Summer Addendum, Subsection IWB, Table IWB-2500-1, Examination Category B-D, Full Penetration Welds of Nozzles in Vessels, Item No. B 3.100, Nozzle Inside Radius Section.

C. RELIEF REQUESTED

Pursuant to the provisions of 10 CFR 50.55a(a)(3), relief is requested from the requirements specified in the ASME Boiler and Pressure Vessel Code, Section XI, 1983 Edition, 1983 Summer Addendum, Subsection IWB, Category B-D, Item No. B 3.100.

D. BASIS FOR RELIEF

The results shown in WCAP-15262 have demonstrated that it is highly unlikely that the reactor vessel nozzles considered in this report would fail under any anticipated service conditions. In-service inspections can hardly benefit plant safety for something that is very unlikely to happen. The inspection is difficult to perform because of the complex geometry and inspections which have been done in the past have not led to discovery of any indications at all. Therefore, the in-service inspections of the Indian Point 3 reactor vessel nozzle inner radius regions can be eliminated, without any significant risk to the structural integrity of the vessel. See WCAP-15262, Revision 0, "Technical Basis for Elimination of Reactor Vessel Nozzle Inner Radius Inspections Indian Point Unit 3," July 1999 (Attachment II) for additional details.

E. ALTERNATE EXAMINATION REQUIREMENTS:

None

F. IMPLEMENTATION SCHEDULE

September 10, 1999. Approval of the relief request by this date will facilitate its implementation for the In-service Inspection activities that are scheduled to be performed in the upcoming refueling outage (RO) 10. RO 10 is scheduled to start on September 10, 1999.

G. ATTACHMENTS TO THE RELIEF REQUEST

WCAP-15262, Revision 0, "Technical Basis for Elimination of Reactor Vessel Nozzle Inner Radius Inspections, Indian Point Unit 3," July 1999 (Attachment II).