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P.O. Box 63
Lycoming, NY 13093

NINE MILE POINT
NUCLEAR STATION

March 26, 2013

U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

ATTENTION: Document Control Desk

SUBJECT: Nine Mile Point Nuclear Station
Unit Nos. 1 and 2; Docket Nos. 50-220 and 50-410

American Society of Mechanical Engineers (ASME) Code, Section XI, Inservice
Inspection Program – Request to Use a Later ASME Code Edition and Addenda

In accordance with 10 CFR 50.55a(g)(4)(iv), Nine Mile Point Nuclear Station, LLC, hereby requests approval to use a later Edition and Addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, for Examination Categories B-L-1, B-M-1, and C-G. The request, described in the Enclosure to this letter, applies to the Nine Mile Point Unit 1 fourth ten-year inservice inspection (ISI) interval and to the Nine Mile Point Unit 2 third ten-year ISI interval.

This letter contains no new regulatory commitments. Should you have any questions regarding the information in this submittal, please contact J. J. Dosa, Director Licensing, at (315) 349-5219.

Very truly yours,

Paul M. Swift
Manager Engineering Services

PMS/DEV

A047
NRC

Document Control Desk

March 26, 2013

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Enclosure: **Nine Mile Point Nuclear Station, Units 1 and 2 - Request for Approval to Use a Later ASME Code Section XI Edition and Addenda for Examination Categories B-L-1, B-M-1, and C-G**

cc: **Regional Administrator, Region I, NRC
Project Manager, NRC
Resident Inspector, NRC**

ENCLOSURE

**NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2
REQUEST FOR APPROVAL TO USE A LATER
ASME CODE SECTION XI EDITION AND ADDENDA FOR
EXAMINATION CATEGORIES B-L-1, B-M-1, AND C-G**

NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2

REQUEST FOR APPROVAL TO USE A LATER ASME CODE SECTION XI EDITION AND ADDENDA FOR EXAMINATION CATEGORIES B-L-1, B-M-1, AND C-G

Pursuant to 10 CFR 50.55a(g)(4)(iv) and in accordance with the guidance of Regulatory Issue Summary (RIS) 2004-12, "Clarification on Use of Later Editions and Addenda to the ASME OM Code and Section XI," Nine Mile Point Nuclear Station, LLC (NMPNS) requests NRC approval to utilize the 2007 Edition through the 2008 Addenda of the American Society of Mechanical Engineers (ASME) Code, Section XI, for Examination Categories B-L-1, B-M-1, and C-G. This request applies to both Nine Mile Point Unit 1 (NMP1) and Unit 2 (NMP2).

1. ASME Code Components Affected

The affected Class 1 and 2 components are ASME Section XI, Examination Categories:

- B-L-1, Pressure Retaining Welds in Pump Casings
- B-M-1, Pressure Retaining Welds in Valve Bodies
- C-G, Pressure Retaining Welds in Pumps and Valves

2. Applicable Code Edition and Addenda

The Code of Record for the current inservice inspection (ISI) interval for both NMP1 and NMP2 for Code Class 1 and 2 components is the ASME Section XI, 2004 Edition. This Code of Record is applicable to the ASME Category B-L-1, B-M-1, and C-G welds, for which the use of a subsequent ASME Code Edition and Addenda is being requested.

3. Proposed Subsequent Code Edition and Addenda (or Portion)

A. Background

In accordance with the 10-year update requirements of 10 CFR 50.55a(g)(4)(ii), ASME Section XI ISI activities at NMP1 and NMP2 were initially updated to the 2001 Edition through the 2003 Addenda, with an implementation date of August 23, 2009 for NMP1 and April 5, 2008 for NMP2. The NMP1 and NMP2 ISI Programs were subsequently updated to the 2004 Edition as authorized by the NRC letter in a letter dated December 2, 2009 (Accession Number ML093310427).

B. Proposed Use of Subsequent Code Edition and Addenda

The subsequent code edition and addenda proposed for the NMP1 and NMP2 ISI Program, Examination Categories B-L-1, B-M-1, and C-G, is ASME Section XI, 2007 Edition through the 2008 Addenda. In the 2008 Addenda, Examination Categories B-L-1, B-M-1, and C-G were deleted from the Code.

In the 2004 Edition of ASME Section XI:

- Category B-L-1 requires a visual examination (VT-1) of pump casing welds.
- Category B-M-1 requires a surface examination of valve body welds for valves less than 4 inches NPS (nominal pipe size) and a volumetric examination for valves larger than 4 inches NPS.
- Category C-G requires a surface examination of pump and valve body welds in all components in each piping run examined under Examination Category C-F.

ASME Examination Categories B-L-1, B-M-1, and C-G welds were removed in the ASME Section XI, 2007 Edition through the 2008 Addenda because experience has not identified any failures in pump casing or valve body welds. The requirements for performing these examinations result in unnecessary radiation exposure for non-destructive examination (NDE) personnel.

NINE MILE POINT NUCLEAR STATION, UNITS 1 AND 2

REQUEST FOR APPROVAL TO USE A LATER ASME CODE SECTION XI EDITION AND ADDENDA FOR EXAMINATION CATEGORIES B-L-1, B-M-1, AND C-G

For Class 1 pressure retaining pump casing and valve body welds, any degradation of the pump or valve interior will be detected by the Category B-L-2 and B-M-2, Visual VT-3 examinations or by the mechanic working on the component internals. Through wall leakage will be detected by the Visual VT-2 examinations during system pressure tests.

For Class 2 welds in pumps and valves, any degradation of the pump or valve interior will be detected by the mechanic working on the component internals. Through-wall leakage will be detected by the Visual VT-2 examinations during the system pressure tests.

The subsequent code edition and addenda proposed is the ASME Section XI, 2007 Edition through the 2008 Addenda, for Examination Categories B-L-1, B-M-1, and C-G. The 2008 Addenda of Section XI has been incorporated into the regulations by reference, as published in the Federal Register on June 21, 2011 (76 FR 36232), and became effective July 21, 2011. Furthermore, 10 CFR 50.55a(b) contains no limitations or modifications on Examination Categories B-L-1, B-M-1, and C-G in the 2007 Edition, 2008 Addenda of the ASME Code, Section XI.

4. Related Requirements

For the portion of the subsequent Code Edition and Addenda to be used, no related requirements would need to be implemented since the 2008 Addenda deletes Examination Categories B-L-1, B-M-1, and C-G from the Code.

5. Precedents

An essentially identical request was approved by the NRC for the Palo Verde Nuclear Generating Station. Reference NRC letter dated September 18, 2012, "Palo Verde Nuclear Generating Station, Units 1, 2, and 3 – Request for Relief to Use a Later Edition of ASME Code, Section XI, for Examination Categories B-L-1, B-M-1, and C-G (TAC Nos. ME7805, ME7806, and ME7807)" (ADAMS Accession Number ML12257A141).

6. Duration of Proposed Request

The duration of this request will be for the remainder of the NMP1 Fourth ISI Interval (scheduled to be completed August 22, 2019) and the remainder of the NMP2 Third ISI Interval (scheduled to be completed April 4, 2018).