

July 15, 1986

Docket No. 50-220

DISTRIBUTION

Niagara Mohawk Power Corporation  
ATTN: Mr. C. V. Mangan  
Senior Vice President  
c/o Miss Catherine R. Seibert  
300 Erie Boulevard West  
Syracuse, New York 13202

Docket File  
LPDR  
BWR#1 Rdg  
J. Kelly  
N. Thompson  
J. Partlow  
ACRS (10)

NRC PDR  
Gray File  
C. Jamerson  
R. Bernero  
OGC (for info only)  
E. Jordan  
B. Grimes  
B. Turovlin

Dear Mr. Mangan:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - INSERVICE INSPECTION PROGRAM  
(TAC 60451)

Re: Nine Mile Point Nuclear Station, Unit No. 1

In letters dated December 16, 1985 and February 21, 1986, you submitted the Nine Mile Point Unit 1 Second 10-year Interval Inservice Inspection Program Plan and the Nine Mile Point Unit 1 Second 10-year Interval Inservice Inspection Program Plan for Component Supports, respectively. The staff has reviewed the available information and find that we need the information and/or clarification requested in the enclosure in order to complete our review. You should provide the requested information on a schedule to be negotiated with your Project Manager.

The reporting and recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under PL 96-511.

Sincerely,

/s/JZwolinski

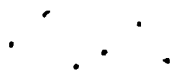
John A. Zwolinski, Director  
BWR Project Directorate No. 1  
Division of BWR Licensing

Enclosure:  
Information Request

cc w/enclosure:  
See next page

8607230066 860715  
PDR ADOCK 05000220  
Q PDR

|      |            |            |             |   |   |   |   |
|------|------------|------------|-------------|---|---|---|---|
| OFC  | :DBL:PD#1  | :DBL:PD#1  | :DBL:PD#1   | : | : | : | : |
| NAME | :CJamerson | :JKelly JK | :JZwolinski | : | : | : | : |
| DATE | :07/14/86  | :07/14/86  | :07/15/86   | : | : | : | : |



[Faint, illegible text, possibly a header or introductory paragraph]

[Faint, illegible text, possibly a main body paragraph]

[Faint, illegible text, possibly a concluding paragraph or footer]

Mr. C. V. Mangan  
Niagara Mohawk Power Corporation

Nine Mile Point Nuclear Station,  
Unit No. 1

cc:  
Troy B. Conner, Jr., Esquire  
Conner & Wetterhahn  
Suite 1050  
1747 Pennsylvania Avenue, N. W.  
Washington, D. C. 20006

Frank R. Church, Supervisor  
Town of Scriba  
R. D. #2  
Oswego, New York 13126

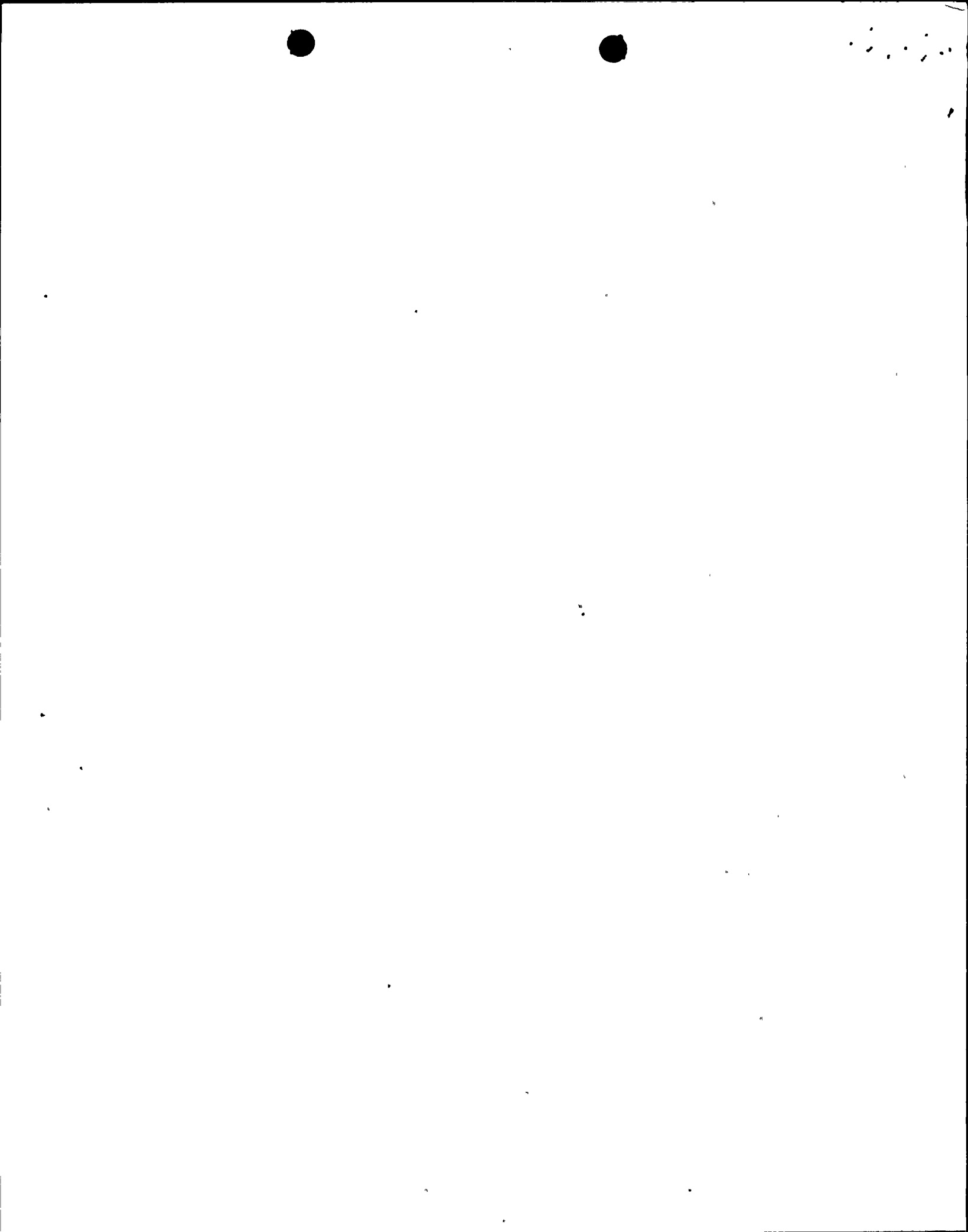
Niagara Mohawk Power Corporation  
ATTN: Mr. Thomas Perkins  
Plant Superintendent  
Nine Mile Point Nuclear Station  
Post Office Box 32  
Lycoming, New York 13093

Resident Inspector  
U. S. Nuclear Regulatory Commission  
Post Office Box 126  
Lycoming, New York 13093

John W. Keib, Esquire  
Niagara Mohawk Power Corporation  
300 Erie Boulevard West  
Syracuse, New York 13202

Regional Administrator, Region I  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Mr. Jay Dunkleberger  
Division of Policy Analysis  
and Planning  
New York State Energy Office  
Agency Building 2  
Empire State Plaza  
Albany, New York 12223



ENCLOSURE

REQUEST FOR ADDITIONAL INFORMATION

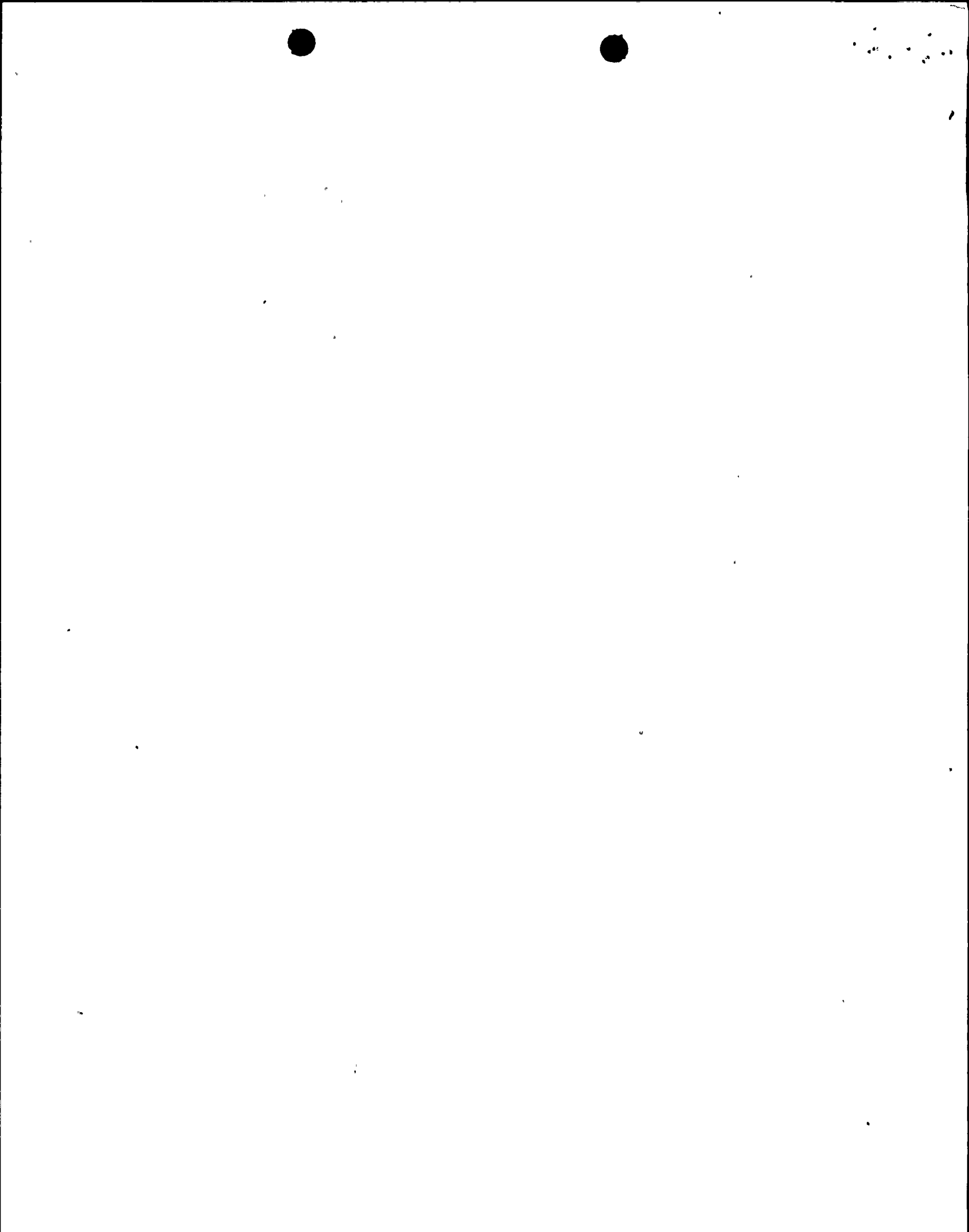
RELATED TO THE NINE MILE POINT UNIT 1 INSERVICE INSPECTION PROGRAM  
 NIAGARA MOHAWK POWER CORPORATION  
 NINE MILE POINT NUCLEAR STATION, UNIT NO. 1  
 DOCKET NO. 50-220

1. Provide the staff with the Boundary Diagrams, as discussed in Section 3.1, "System Classification", which define the ASME Code Class 1, Class 2, and Class 3 boundaries for the systems being examined in the Nine Mile Point Unit 1 Second 10-Year Interval ISI Program Plan.
2. The Licensee has prepared the ISI Program Plan to meet the requirements of the ASME Code Section XI 83S83 except that the selection, extent and frequency of examinations for Class 2 piping welds are to be in accordance with the requirements of Code Case N-408. Throughout the ISI Program Plan, ASME Code Section XI paragraphs are referenced that are not included in Section XI until the Winter 1983 Addenda. The contents of the referenced paragraphs are included, however, in Code Case N-408. The following table lists some examples of incorrect references:

| <u>NES Document No.</u>              | <u>Page</u> | <u>Referenced Paragraph(s):</u> | <u>Reference Should Be:</u> |
|--------------------------------------|-------------|---------------------------------|-----------------------------|
| 81A1145, "General Text"              | 16          | IWC-1221(c)                     | N-408(a)(3)                 |
|                                      |             | IWC-1222(b)&(c)                 | N-408(b)(2)&(3)             |
| 81A1147, "Main Steam"                | 5           | IWC-1222(b)                     | N-408(b)(2)                 |
| 81A1148, "Feedwater"                 | 5           | IWC-1222(a)&(c)                 | N-408(b)(1)&(3)             |
| 81A1150, "Shutdown Cool."            | 4           | IWC-1221(b)                     | N-408(a)(1)                 |
| 81A1151, "Emerg. Cool."              | 4           | IWC-1221(a)                     | N-408(a)(1)                 |
| 81A1152, "Core Spray"                | 4           | IWC-1221(a)                     | N-408(a)(1)                 |
| 81A1154, "Liquid Poison"             | 4           | IWC-1222(a)                     | N-408(b)(1)                 |
| 81A1155, "CR Drive"                  | 4           | IWC-1222(a)                     | N-408(b)(1)                 |
| 81A1156, "Closed Loop Cooling Water" | 5           | IWC-1222(c)                     | N-408(b)(3)                 |
| 81A1157, "Reactor Water Clean-Up"    | 5           | IWC-1222(b)&(c)                 | N-408(b)(2)&(3)             |
| 81A1160, "Contain. Spray"            | 4           | IWC-1220(c)&<br>N-408(a)(1)&(2) | N-408(a)(1)&(3)             |
| 81A1163, "Inert Gas Purge and Fill"  | 5           | IWC-1222(b)<br>(S '75 Addenda)  | N-408(b)(2)                 |

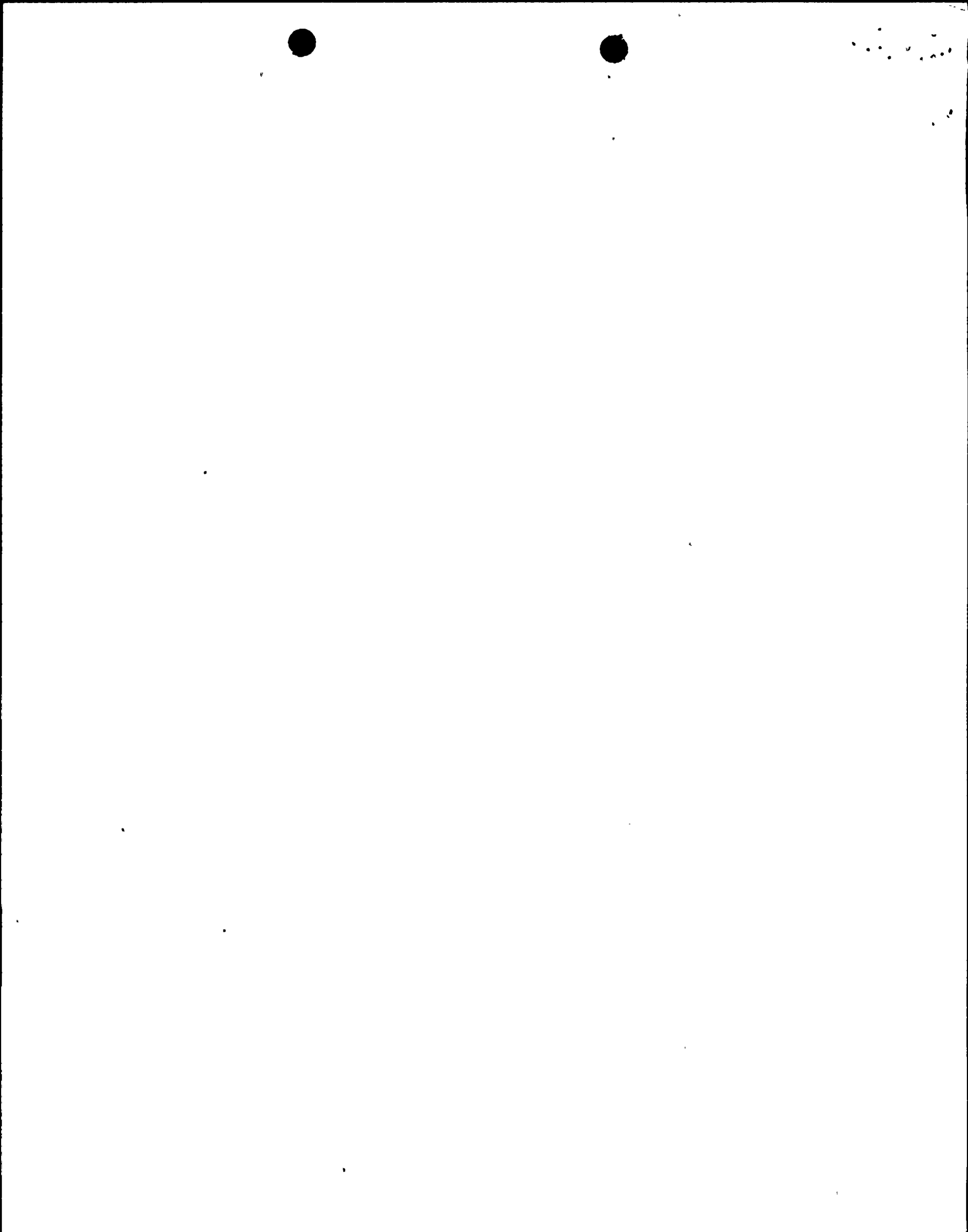
The above table is not meant to be a complete listing of all incorrect references. It is the Licensee's responsibility to find and correct all of the questionable references. The Licensee should make the necessary corrections to the ISI Program Plan.

3. Table 3-1, "Exemptions", of NES document No. 81A1148, "Feedwater System ISI Plan", states that all Class 2 piping and components in systems 49, 50, 53, and 59 are exempt per IWC-1222(c) (see



item B. above). Exemptions for one system should not be listed under another system. To eliminate confusion, the Licensee should: (1) state whether or not the Feedwater system is included in this list, (2) define what systems 49, 50, 53 and 59 are, and (3) list the above exemptions under their respective sections of the ISI Program Plan.

4. Per the requirements of 10 CFR 50.55a(g)(5), if the licensee determines that certain code examination requirements are impractical and relief is requested, the licensee shall submit information to the staff to support that determination. The Licensee should provide a formal submittal of requests for relief, including supporting technical justifications, from the ASME Code Section XI requirements which the Licensee has determined to be impractical to perform at Nine Mile Point Unit 1. When preparing requests for relief, the staff suggests that the Licensee follow the attached Appendix A, "Guidance for Preparing Requests for Relief from Certain Code Requirements Pursuant to 10 CFR 50.55a(a)(3)".





## APPENDIX A

### GUIDANCE FOR PREPARING REQUESTS FOR RELIEF FROM CERTAIN CODE REQUIREMENTS PURSUANT TO 10 CFR 50.55a(a)(3)

#### A. Description of Requests for Relief

The guidance in this enclosure is intended to illustrate the type and extent of information that is necessary for "request for relief" of items that cannot be fully inspected to the requirements of Section XI of the ASME Code. The preservice/in-service inspection program should identify the inspection and pressure testing requirements of the applicable portion of Section XI that are deemed impractical because of the limitation of design, geometry, radiation considerations or materials of construction of the components. The request for relief should provide the information requested in the following section of this appendix for the inspections and pressure tests identified above.

#### B. Request for Relief From Certain Inspection and Testing Requirements

Many requests for relief from testing requirements submitted by licensees have not been supported by adequate descriptive and detailed technical information. This detailed information is necessary to: (1) document the impracticality of the ASME Code requirements within the limitations of design, geometry and materials of construction of components; and (2) determine whether the use of alternatives will provide an acceptable level of quality and safety.

Relief request submitted with a justification such as "impractical", "inaccessible", or any other categorical basis, require additional information to permit an evaluation of that relief request. The objective of the guidance provided in this section is to illustrate the extent of the information that is required to make a proper evaluation and to adequately document the basis for granting the relief in the Safety Evaluation Report. Subsequent requests for additional information and delays in completing the review can be considerably reduced if this information is provided initially in the licensee's submittal.

For each relief request submitted, the following information should be included:

1. An identification of the component(s) and the examination requirement for which relief is requested.
2. The number of items associated with the requested relief.
3. The ASME Code class.
4. An identification of the specific ASME Code requirement that has been determined to be impractical.
5. The information to support the determination that the requirement is impractical; i.e., state and explain the basis for requesting



relief. If the Code required examination cannot be performed because of a limitation or obstruction, describe or provide drawings showing the specific limitation or obstruction, and provide an estimate of the percentage of the Code required examination that can be completed on the individual components requiring relief.

6. An identification of the alternative examinations that are proposed: (a) in lieu of the requirements of Section XI; or (b) to supplement examinations performed partially in compliance with the requirements of Section XI.
7. A description of the ASME Code Section III fabrication examinations that were completed and documented during construction for the specific components listed in the relief requests.
8. A description and justification of any changes expected in the overall level of plant safety by performing the proposed alternative examination in lieu of the examination required by Section XI. If it is not possible to perform alternate examinations, discuss the impact on the overall level of plant quality and safety.

For inservice inspection, provide the following additional information regarding the inspection frequency:

1. State when the request for relief would apply during the inspection period or interval (i.e., whether the request is to defer an examination.)
2. State when the proposed alternative examinations will be implemented and performed.
3. State the time period for which the requested relief is needed.

Technical justification or data must be submitted to support the relief request. Opinions without substantiation that a change will not affect the quality level are unsatisfactory. If the relief is requested for inaccessibility, a detailed description or drawing which depicts the inaccessibility must accompany the request. A relief request is not required for tests prescribed in Section XI that do not apply to your facility. A statement of "N/ A" (not applicable) or "none" will suffice.

C. Request for Relief for Radiation Considerations

Exposures of test personnel to radiation to accomplish the examinations prescribed in Section XI of the ASME Code can be an important factor in determining whether, or under what conditions, an examination must be performed. A request for relief must be submitted by the licensee in the manner described above for inaccessibility and must be subsequently approved by the NRC staff.

Some of the radiation considerations will only be known at the time of the test. However, from experience at operating facilities, the licensee generally is aware of those areas where relief will be necessary and should submit as a minimum, the following information with the request for relief:

100-100000-100000

1. The total estimated man-rem exposure involved in the examination.
2. The radiation levels at the test area.
3. Flushing or shielding capabilities which might reduce radiation levels.
4. A proposal for alternate inspection techniques.
5. A discussion of the considerations involved in remote inspections.
6. Similar welds in redundant systems or similar welds in the same systems which can be inspected.
7. The results of preservice inspection and any inservice results for the welds for which the relief is being requested.
8. A discussion of the failure consequences of the weld which would not receive the Code required examination.

