Docket No. 50-220

Mr. Charles V. Mangan Senior Vice President Niagara Mohawk Power Corporation 301 Plainfield Road Syracuse. New York 13212 DISTRUBTION
Docket File
NRCPDR
SVarga
SVarga
BBoger
CVogan
RBendict
OGC

DISTRUBTION
EJordan
ACRS(10)
BJordan
BTurovlin
FLitton
JJohnson

Dear Mr. Mangan:

SUBJECT:

REQUEST FOR ADDITIONAL INFORMATION - INSERVICE INSPECTION

PROGRAMS (TAC 60451)

RE:

Nine Mile Point Nuclear Station, Unit No. 1

By letter dated April 1, 1987, Niagara Mohawk Power Corporation submitted relief requests for the first and second ten-year interval Inservice Inspection Programs. The programs and relief requests have been reviewed by the NRC staff and its contractor, and we find that we need additional information to complete our review. The enclosure to this letter discusses the needed information.

Sincerely

Robert A. Benedict, Project Manager Project Directorate I-1 Division of Reactor Projects, I/II

Enclosure: As stated

cc: See next page

PDI-1 CVogan 0 12/\6/87 PDI-1 RBenedict 12/15/87 PDI-1() N RCapra) 12/15/87

A . 12" 4 . W. The second of th p ' d The second of th A 8 8 8 11 The second of th (5) W

11 " \* 19 ENGER 4 ' 1  $\mathbf{v} = \begin{bmatrix} \mathbf{v} & \mathbf{v} & \mathbf{v} \\ \mathbf{v} & \mathbf{v} \end{bmatrix} \mathbf{v} = \mathbf{v} + \mathbf{v} \mathbf{v} \mathbf{v} \mathbf{v} \mathbf{v}$ E 186 \* FF 5 . **5** h 4000 3 \* 4

The state of the s

জনত বিশ্ববিশ্ব সংযুদ্ধ বি প্ৰতিষ্ঠ কৰিব এই এই বিশ্ব বিশ্ব বিশ্ব বিশ্ব বিশ্ব বিশ্ব কৰিব কৰিব বিশ্ব বিশ্ব বিশ্ব ব শীৰ্ষা প্ৰকৃষ্টি বি প্ৰতিষ্ঠ বিশ্ব বিশ্ব

ate v Ditt

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

Mr. Thomas Perkins
General Supt.-Nuclear Generation
Niagara Mohawk Power Corporation
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

Mr. Gary Wilson, 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

Ms. Donna Ross New York State Energy Office 2 Empire State Plaza 16th Floor Albany, New York 12223 Mr. Thomas W. Roman Unit 1 Station Superintendent Nine Mile Point Nuclear Station Post Office Box 32 Lycoming, New York 13093



# REQUEST FOR ADDITIONAL INFORMATION FIRST AND SECOND 10-YEAR INTERVAL INSERVICE INSPECTION RELIEF REQUESTS

#### NIAGARA MOHAWK POWER CORPORATION NINE MILE POINT NUCLEAR STATION UNIT 1 DOCKET NUMBER 50-220

## A. Status of Review

The Nine Mile Point Nuclear Station Unit 1 Second 10-Year Interval Inservice Inspection Program Plan, Revision 0, has been evaluated by the staff. The Program Plan was determined to be acceptable and in compliance with 10 CFR 50.55a(g)(4), contingent upon satisfactory resolution of any subsequent requests by the licensee for relief from the ASME Code Section XI requirements that the licensee has determined to be impractical.

On April 1, 1987, the licensee submitted relief requests for both the first and second 10-year inspection intervals. Based upon its review of these relief requests, the staff needs the following information in order to complete its review.

### B. Additional Information Requested

- 1. Request for Relief 11IRR2 for the first interval and ISI-9 for the second interval: Relief is requested from examining 100% of the Code-required volume of all welds in 10% (equal to four) of the peripheral CRD housings. The licensee states that the subject welds cannot be fully inspected ultrasonically due to limitations of design. The coverage of each of the four ultrasonically examined CRD housing welds is estimated to be 50% of the Code-required volume. A sector of approximately 180 degrees of each housing circumference is obstructed by adjacent housings and their hydraulic lines. Can 50% of four additional welds be examined in order to meet the intent of the 10% Code requirement?
- 2. Request for Relief ISI-1 for the second interval: Relief is requested from performing the Code-required volumetric examination of the beltline region welds. The licensee states that the Code-required volumetric examination of the welds in the beltline region is impractical based on the existing design which precludes access to the welds. All Item No. B1.10 welds that are accessible for volumetric examination should be examined as an alternative to the examination of the beltline region welds. Identify those welds which will be examined as an alternative to examining the beltline region welds.
- 3. Request for Relief 1IIRR4A for the first interval: Relief is requested from performing the Code-required visual examination

. • 1

of internal pressure boundary surfaces of one of the required ten Group 9 - Reactor Vessel Head Safety Valves in the Main Steam system. The licensee also requests relief from the requirements to examine valve bodies by qualified examiners per Section XI Subarticle IWA-2300 and to document results and evaluations in accordance with Section XI Article IWA-6000. The licensee states: "Group 9 valves received maintenance inspections by the Owner's quality control personnel. Other maintenance inspections were performed when all Group 9 valves were refurbished. Fifty percent of the valves are rotated out of service and are replaced by spares each refueling outage. All were sent off-site each outage for refurbishing and testing prior to being returned to service or placed in storage as spares. Relief is requested from the examiner qualification and certification requirements of Section XI Subarticle IWA-2300 and documentation requirements of Article IWA-6000. Documentation, inspector certification of training and qualification, specific visual findings of valve body and other internal pressure retaining surfaces, and evaluation of results are not in place. Visual inspection similar to that required is directly evidenced by selective replacement, repair or adjustment of parts and indirectly by accomplishment of pressure and operability tests conducted off-site."

No technical basis for requesting relief is supplied in this relief request. During the time the valves were off-site, were examinations performed that were equivalent or superior to the Code-required visual examination? As stated in IWA-2240 of Section XI, alternative examination methods, a combination of methods, or newly developed techniques may be substituted for the methods, specified in Section XI, provided the Inspector is satisfied that the results are demonstrated to be equivalent or superior to those of the specified method. If an IWA-2240 evaluation cannot be performed by an Authorized Nuclear Inservice Inspector (ANII) and, thus, relief is still requested, provide explicit information to justify why relief should be granted.

- 4. Requests for Relief 1IIRR8A and 1IIRR8B for the first interval and ISI-10 for the second interval: The licensee states that a significant portion of the welds for which relief is requested is inaccessible for examination and requests total relief from the Code-required volumetric examination. For each of the subject welds, provide an estimate of the percentage of the Code-required volume that is accessible for examination.
- 5. Request for Relief 1IIRR3 for the first interval: The licensee lists two reactor recirculation pump casing welds (32-SW-11S-0 and 32-SW-15S-9) that received a liquid penetrant examination. Verify that weld number 32-SW-15S-9 is the correct weld number.

