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SUBJECT: Responds to violations noted in Insp Rept 50-220/88-01.

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June 16, 1988
NMPIL 0268

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Gentlemen:

The purpose of this letter is to inform you of the status of the actions Niagara Mohawk is taking to resolve concerns relating to the Inservice Inspection Program. These concerns were identified in Nuclear Regulatory Commission Inspection Report 50-220/87-21 and in Licensee Event Report 88-01.

Niagara Mohawk has conducted an extensive review of both the first and second ten year interval inservice inspection programs. This review was conducted in two phases. Phase one consisted of a review of the program plans to confirm that the ASME Section XI and Nuclear Regulatory Commission requirements were correctly incorporated. Phase two consisted of a review of inspection data to confirm that the required examinations were performed. The review process identified four concerns:

- The program plans did not specify all the required examinations.
- Inspection records could not be located for all the examinations that were scheduled to be performed.
- Scheduled examinations exceed the requirements of the ASME Code or Nuclear Regulatory Commission commitments.
- In some cases, the schedule requires the examination of welds that are inaccessible, inaccurately numbered, or that have been removed during plant modifications.

Niagara Mohawk is committed to resolve the concerns regarding our Inservice Inspection Program. To that end, we will assure that the examinations required by the ASME Code and by Nuclear Regulatory Commission regulations are completed prior to startup. The Inservice Inspection Program Plans will be revised to specify clearly the corrected examination schedule. The revised program plan for the Second 10 Year Interval will be submitted to the Commission by December 31, 1988.

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions.

2. It is essential to ensure that all data is entered correctly and consistently.

3. Regular audits should be conducted to verify the accuracy of the information.

Any additional examinations listed in the current program plan that are not required by the ASME Code or by Federal Regulations will be performed to the extent practical. Attachment 1 identifies the examinations that we have determined to be impractical. These examinations will be performed to the extent described in Attachment 1.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



C. D. Terry
Vice President
Nuclear Engineering and Licensing

KBT/pns
5070G
Attachment

xc: Regional Administrator, Region I
Mr. R. A. Capra, Director
Mr. R. A. Benedict, Project Manager
Mr. W. A. Cook, Resident Inspector
Records Management

1-2-3-4-5-6-7-8-9-10-11-12-13-14-15-16-17-18-19-20-21-22-23-24-25-26-27-28-29-30-31-32-33-34-35-36-37-38-39-40-41-42-43-44-45-46-47-48-49-50-51-52-53-54-55-56-57-58-59-60-61-62-63-64-65-66-67-68-69-70-71-72-73-74-75-76-77-78-79-80-81-82-83-84-85-86-87-88-89-90-91-92-93-94-95-96-97-98-99-100



Attachment 1

REACTOR RECIRCULATION SYSTEM

The Inservice Inspection Program Plan scheduled 25% of the welds in the Recirculation System for examination every refueling outage. This examination frequency is consistent with NUREG 0313 Revision 1 requirements. However, the piping in this system was replaced in 1982 with material resistant to intergranular stress corrosion cracking. Therefore, the examination frequency will be revised to require inspection of only 25% of the welds during the 10 year interval. Niagara Mohawk examined the welds on one loop of the recirculation system during the current refueling outage using methods and personnel qualified in accordance with Generic Letter 84-11. Due to the radiation levels in the vicinity of the recirculation piping, the additional examinations specified in the program plan will not be performed.

EXAMINATION TECHNIQUE

The Inservice Inspection Program Plans specifically identify the type of nondestructive examination to be performed on each component in the plan (e.g., penetrant test [PT], magnetic particle test [MT], or ultrasonic test [UT]). However, the ASME Code only specifies a surface or volumetric examination. Niagara Mohawk will perform the applicable surface or volumetric examination required by the Code. The actual technique to be used will be determined based on the material condition, geometry and product type.

PUMP CASING WELDS

We have identified a number of pump casing welds, Category C-G, that were not previously included in the Inservice Inspection Program Plans. The accessible welds on the exterior of one of each type of pump casing will be surface examined during the current refueling outage. Inaccessible welds on the casing will not be examined unless the pump is disassembled for maintenance. Welds on the pump internal discharge barrels are not considered to be pump casing welds.

RELIEF REQUESTS

On April 1, 1987, Niagara Mohawk submitted sixteen relief requests for the second ten-year interval Inservice Inspection Program Plan, T. E. Lempges letter NMP1L 0142. The Commission, to date, has not granted approval of these relief requests. Consequently, Niagara Mohawk will defer these examinations to another outage in the ten year interval. This deferral is consistent with ASME Code requirements and will provide an opportunity to resolve any comments from the Commission before the examination is performed. We will, however, perform those additional examinations and evaluations necessary to respond to the Commission's comments dated December 15, 1987. As stated in our March 15, 1988 letter, C. V. Mangan letter NMP1L 0235, revised relief requests will be submitted within three months after completion of the outage.

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Attachment 1 (Continued)

INACCESSIBLE WELDS

Some of the welds scheduled for inspection in the program plan have been determined to be inaccessible. Certain other welds scheduled in the program plan no longer exist; they were replaced during plant modifications. Niagara Mohawk will select substitute welds where necessary to assure that the required percentages of welds in each inspection category are examined during the outage.

COMPONENT SUPPORTS

Our examinations of component supports have identified several conditions that require corrective action. Niagara Mohawk is evaluating these conditions to determine the affects on structural integrity. If the structural integrity of a system is not affected by the identified conditions, no additional supports in the system will be examined. This position is consistent with ASME Code Interpretation X-1-86-30.

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