



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
REQUEST FOR RELIEF FROM PRESERVICE INSPECTION REQUIREMENTS  
NIAGARA-MOHAWK POWER CORPORATION  
NINE-MILE-POINT NUCLEAR STATION UNIT 2  
DOCKET NO. 50-410  
MATERIALS AND CHEMICAL ENGINEERING BRANCH  
DIVISION OF ENGINEERING TECHNOLOGY

INTRODUCTION

This report is supplemental to the Safety Evaluation Report, NUREG-1047, dated February 1985. There have been six (6) supplements issued to NUREG-1047. Supplement 1 was published in June 1985. It contained the ACRS recommendation and the resolution of a number of outstanding licensing issues. Supplement 2 was published in November 1985. Supplements 3, 4 and 5 were published in July, September and October, 1986. In addition to outstanding and confirmatory issues, several of the latter supplements contained evaluation of requests for relief from ASME Section XI Code requirements. The Preservice Inspection Program Plan for the Nine Mile Point Nuclear Station, Unit 2, was evaluated and approved by the staff in NUREG-1047, Supplement 5.

Pursuant to 10 CFR 50.55a(g)(2), components (including supports) which are classified ASME Code Class 1 and Class 2 shall be designed and be provided with access to enable the performance of (i) inservice examination of such components (including supports) and (ii) tests for operational readiness of pumps and valves, and shall meet the preservice examination requirements set forth in editions of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda in effect 6 months prior to the date of issuance of the construction permit.

Pursuant to 10 CFR 50.55a(g)(5)(iii), should the licensee determine that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information shall be submitted to the Commission in support of that determination and a request made for relief from the ASME Code requirement. After evaluation of the determination, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and may impose alternative requirements that are determined to be authorized by law, will not endanger life or property or the common defense and security, and are otherwise

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in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed.

By letter dated July 29, 1987, Niagara Mohawk Power Corporation (the licensee) submitted a revision to the Preservice Inspection Program Plan for the Nine Mile Point Nuclear Station, Unit 2, including four (4) requests for relief from ASME Section XI Code requirements. The licensee stated that these requirements were impractical to perform at Nine Mile Point-2 and submitted information in support of the determination. The purpose of this report is to review and evaluate the July 1987 submittal.

## EVALUATION

### PRESERVICE INSPECTION PROGRAM PLAN REVISION

The Preservice Inspection Program Plan for the Nine Mile Point-2 facility was evaluated and approved by the staff in Sections 5.2.4 and 6.6 of Supplement 5 of NUREG-1047, October 1986. The licensee voluntarily updated their program to the requirements of Section XI of the ASME Code, 1980 Edition, Winter 1980 Addenda, with the exception of the extent of examination for the residual heat removal (RHR), emergency core cooling (ECC), and containment heat removal (CHR) systems welds, which will be examined to the requirement of Section XI of the ASME Code, 1974 Edition, Summer 1975 Addenda.

The NRC staff has reviewed the July 1987 revision to the Nine Mile Point-2 Preservice Inspection Program Plan and concurs with the technical conclusions reached by its contractor, the Idaho National Engineering Laboratory (INEL), in the report, EGG-ESM-7917, March 1988 subject to the changes discussed below. The changes made by the licensee were not significant and the Preservice Inspection Program Plan remains acceptable and in compliance with the requirement of 10 CFR 50.55a(g)(2).

### PRESERVICE INSPECTION PROGRAM PLAN RELIEF REQUESTS

In the July 1987 submittal, the licensee also requested relief from four (4) Section XI examination requirements in their Preservice Inspection Program Plan. The requests for relief, RR-IWF-1 through RR-IWF-4, were evaluated in Section 3 of the INEL Technical Evaluation Report, EGG-ESM-7917.

The staff concurs with the evaluation provided in that report by NRC contractor INEL that the Section XI ASME Code examination requirements in question are impractical to perform at the Nine Mile Point Nuclear Station, Unit 2. Although the NRC staff agrees with the technical findings of the report, the staff does conclude that the final findings of acceptability of the licensee's relief requests should be made against 10 CFR 50.55a(g)(6)(i) versus 10 CFR 50.55a(3) as referenced in the TER. This is because the relief requests identify items that are impractical to perform moreso than items for which alternatives have been proposed in lieu of the code requirement.



EVALUATION SUMMARY

1. The Preservice Inspection Program for Nine Mile Point Nuclear Station, Unit 2, was evaluated and approved in Supplement 5 of NUREG-1047, October 1986. The revisions submitted in July 1987 were primarily editorial to clarify and make minor changes in context of the program. The Preservice Inspection Program is acceptable and in compliance with 10 CFR 50.55a(g)(2) as stated in Supplement 5 of NUREG-1047.
2. The staff has evaluated the determinations that certain Section XI ASME Code requirements were impractical to perform in the Preservice Inspection Program at the Nine Mile Point Nuclear Station, Unit 2. The licensee demonstrated that compliance with the specific requirements would result in hardship without a compensating increase in the level of quality and safety. Pursuant to 10 CFR 50.55a(g)(6)(i), relief as requested is granted for relief requests RR-IWF-1, RR-IWF-2, RR-IWF-3 and RR-IWF-4.

CONCLUSION

Based on the review summarized herein, the staff concludes that the relief granted and the alternative examinations imposed through this document provide reasonable assurance that the acceptable level of quality and safety intended by the ASME Code will be satisfied. The staff has determined that pursuant to 10 CFR 50.55a(g)(6)(i) granting relief where the inspection requirements are impractical is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest considering the burden that could result if the requirements were imposed on the facility.

Date:

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