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MANGAN, C. V. Niagara Mohawk Power Corp.
RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Discusses exception to Amend 22 to FSAR Subsection NE-4452 of Section III of ASME Code re liquid penetrant exam of surface defects removed by grinding. Exception is one-time departure & will be deleted from amend.

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NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

March 24, 1986
(NMP2L 0666)

Ms. Elinor G. Adensam, Director
BWR Project Directorate No. 3
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Washington, DC 20555

Dear Ms. Adensam:

Re: Nine Mile Point Unit 2
Docket No. 50-410

Amendment 22 to the Final Safety Analysis Report included the insertion on page 3.8-25.b of an exception to Subsection NE-4452 of Section III of ASME code. The exception was stated as follows:

> A liquid penetrant examination of surface defects removed by grinding is required by this section. The shelf-to-downcomer embedment plate weld at azimuth 74°10' was repaired by grinding. In lieu of liquid penetration examination, visual examination can be utilized.

This exception to NE-4452 applied only to a 1-inch portion of a 10-inch long 1/2" x 3/4" fillet weld on one shelf-to-downcomer embedment plate located at elevation 196'-0", azimuth 74°10' (see attached drawing segments). This weld segment should have been liquid penetrant-tested in accordance with the ASME Code, Section III, Subsection NE, 1974 edition through winter 1976 addenda, following the removal of an arc strike by grinding. Instead, the weld was visually reinspected by ITT Grinnell in accordance with their field quality control procedure for visual examination. This examination provided adequate assurance that the arc strike was removed, and the remaining weld metal was sound and free of defects. Liquid penetrant reexamination is not now feasible as draining of the suppression pool would be required to gain access to the weld.

B001
1/1

The subject embedment plate was originally intended to be used for bracing the downcomers. However, the plate has been modified and is now used for lateral bracing of a safety relief valve T-quencher. Calculations have shown that the plate is lightly loaded, with a factor of safety greater than ten. Thus, even if the suspect 1-inch of visually examined weld were to be neglected for strength considerations, it would still be concluded that the embedment plate is structurally adequate.

The above-described situation involves a one-time departure from NE-4452 and not a programmatic exception. Consequently, the exception will be deleted from the Final Safety Analysis Report by Amendment 25.

Very truly yours,

C. V. Mangan
Senior Vice President

RAC:ja
1414G
Attachment

xc: R. A. Gramm, NRC Resident Inspector
Project File (2)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
Niagara Mohawk Power Corporation	)	Docket No. 50-410
(Nine Mile Point Unit 2)	)	

AFFIDAVIT

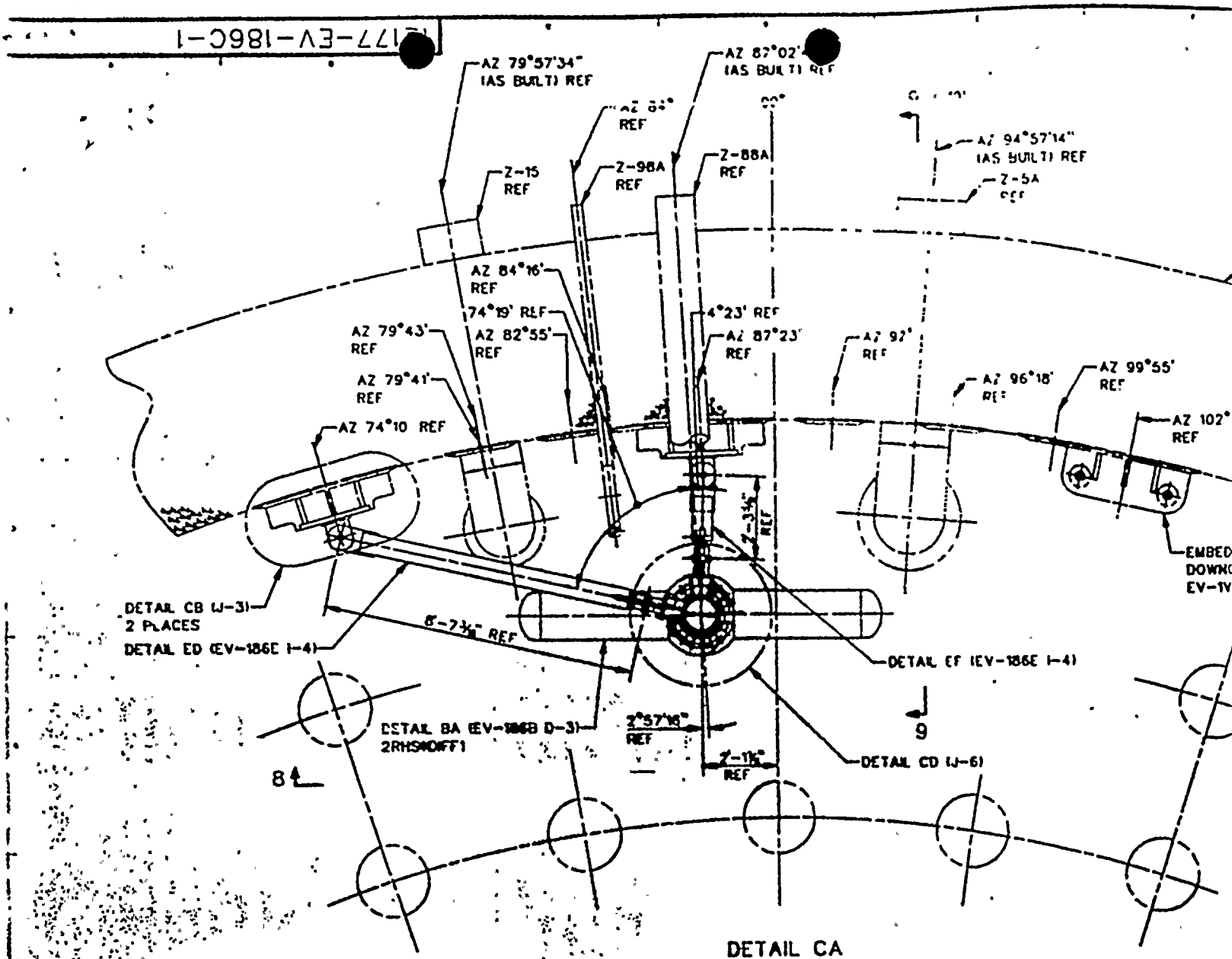
C. V. Mangan, being duly sworn, states that he is Senior Vice President of Niagara Mohawk Power Corporation; that he is authorized on the part of said Corporation to sign and file with the Nuclear Regulatory Commission the documents attached hereto; and that all such documents are true and correct to the best of his knowledge, information and belief.

C V Mangan

Subscribed and sworn to before me, a Notary Public in and for the State of New York and County of Onondaga, this 24th day of March, 1986.

Janis M. Macro
Notary Public in and for
Onondaga County, New York

My Commission expires:
JANIS M. MACRO
Notary Public in the State of New York
Qualified in Onondaga County No. 4784555
My Commission Expires March 30, 1987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AZ 87°02' (AS BUILT) REF
AZ 94°57'14" (AS BUILT) REF
Z-15 REF
Z-98A REF
Z-88A REF
Z-5A REF
AZ 84°16' REF
74°19' REF
4°23' REF
AZ 87°23' REF
AZ 79°43' REF
AZ 82°55' REF
AZ 79°41' REF
AZ 74°10 REF
AZ 97° REF
AZ 96°18' REF
AZ 99°55' REF
AZ 102° REF
EMBED DOWN EV-1V
DETAIL CB (J-3) 2 PLACES
DETAIL ED (EV-186E I-4)
8'-7¾" REF
DETAIL EF (EV-186E I-4)
DETAIL BA (EV-186B D-3) 2RHS#OFF1
2°57'16" REF
2'-1½" REF
DETAIL CD (J-6)
8
9
DETAIL CA
EL 201'-8¾" REF
2-RHS-003-253-2
EP-13C REF
Z-347 REF
EL 199'-2" REF
PL-012 REF
EL 199'-0" REF
EL 196'-3"
EL 195'-6" REF
DETAIL EA (EV-186E B-10)
EL 199'-0" REF
PL-013 REF

ISO# 66-11	
WELD# VENDOR	
HOLD TAG# NA	
DEFECT CODE E2	

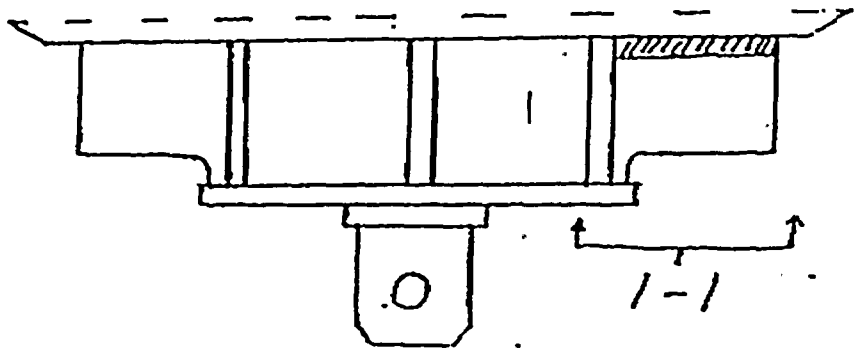
INSPECTION REPORT
SUPPLEMENTAL SHEET

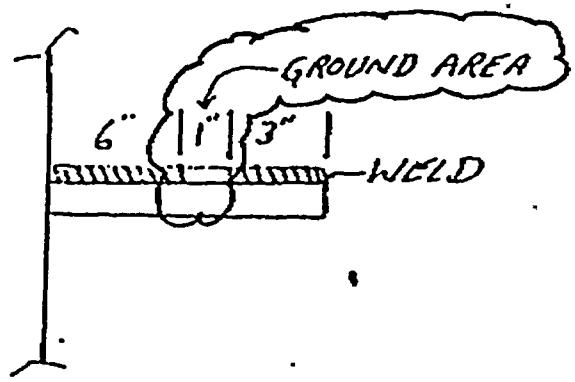
Form F10.1B
Rev. 3

SHT. 2 OF 2

REPORT NO. 85-08-015516

SKETCH TAKEN FROM DETAIL "CE" OF EV186C-1





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