

# CATEGORY 1

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SUBJECT: Requests relief from ASME Code min exam requirements delineated in Code Section IWB-2412 & IWC-2412, as NMP will be using risked-informed methods to develop, monitor & update existing ISI program for piping to more efficient program.

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September 15, 1999  
NMP2L 1468

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

RE: Nine Mile Point Unit 2  
Docket No. 50-410  
NPF-69

**Subject: Second Ten-Year Interval Relief Request**

Gentlemen:

NRC Information Notice 98-44, "Ten-Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping," states that for licensees that intend to implement a risk-informed inservice inspection (RI-ISI) program for piping and do not have a pilot plant application currently being reviewed by the NRC, the NRC will consider authorizing a delay of up to two years in implementation of the next ten-year ISI program for piping only. Based on this Information Notice and other guidance documents, Nine Mile Point Unit 2 (NMP2) will be using risked-informed methods to develop, monitor, and update the existing ISI program for piping to a more efficient program. Consistent with this effort, Niagara Mohawk Power Corporation (NMPC) requests relief from the ASME Code minimum examination requirements delineated in Code Section IWB-2412 and IWC-2412.

Accordingly, pursuant to 10 CFR 50.55a(a)(3)(i), the attached relief request is submitted for NRC review and approval. NMPC requests that the NRC approve the request no later than November 15, 1999, so that we can appropriately plan the ISI scope for the upcoming NMP2 refueling outage in the spring of 2000.

Very truly yours,

Richard B. Abbott  
Vice President - Nuclear Engineering

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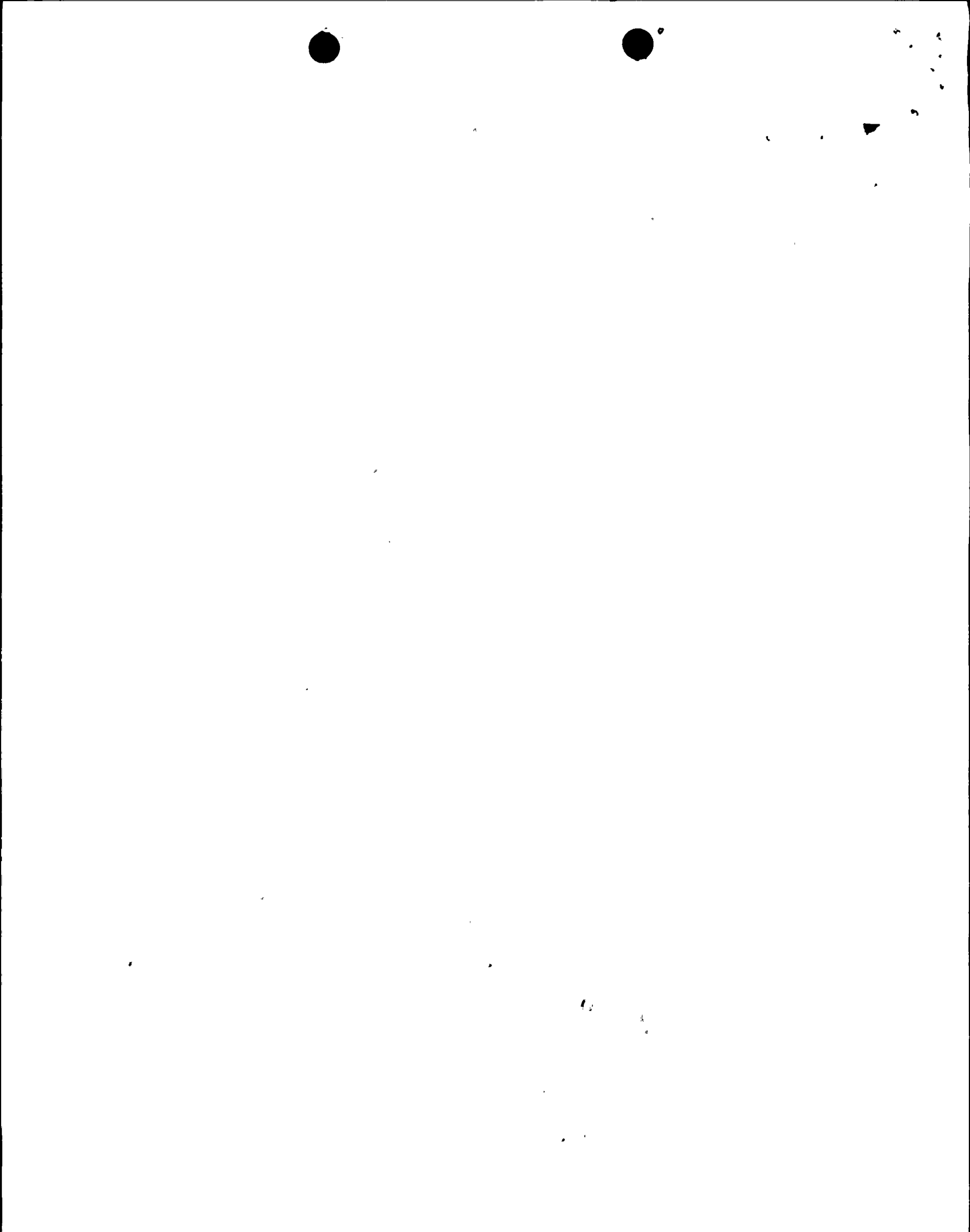
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xc: Mr. H. J. Miller, NRC Regional Administrator, Region I  
Mr. S. S. Bajwa, Section Chief PD-I, Section 1, NRR  
Mr. G. K. Hunegs, NRC Senior Resident Inspector  
Mr. D. S. Hood, Senior Project Manager, NRR  
Records Management

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## SECOND TEN-YEAR INTERVAL ISI RELIEF REQUEST

**Identifier:** RR-RI-ISI-1

**Component:** Class 1 & 2 Piping of the ASME B&PV Code, Section XI, 1989 Edition, Division 1

**System Titles:** All Systems with Components Classified as ASME Category B-J, C-F-1, and C-F-2

**Functions:** Percentage requirements per IWB-2412 and IWC-2412

**Code Class:** ASME Section XI Class 1 & 2

**Examination Requirements:** The required examination in each examination category shall be completed during each successive inspection interval in accordance with Table IWB-2412-1 and/or IWC-2412-1.

**Burden:** NMPC will develop and implement a Risk-Informed Inservice Inspection (RI-ISI) methodology following the guidance of ASME Section XI Code Case N-578 by Refueling Outage (RFO8). Nine Mile Point Unit 2 completed its first refueling outage of the First Period (RFO6) in July 1998. Those remaining piping examinations needed to meet the code required First Period percentage requirements are currently scheduled for the last refueling outage of the First Period (RFO7, March-April 2000). Nine Mile Point Unit 2 requests relief from the Class 1 & 2 piping examination percentage requirements stated in Tables IWB-2412-1 and IWC-2412-1 (i.e., 16% minimum examinations completed). This request excludes the augmented examination program of Generic Letter 88-01, NRC position on IGSCC in BWR Austenitic Stainless Steel Piping, for Category D welds.

This relief will eliminate performance of piping examinations that may no longer be required once the RI-ISI methodology is in place. NMPC has completed approximately ten (10) percent of the Category B-J, none of the 33 C-F-1, and six (6) percent of the C-F-2 piping weld exams.

**Recommended Substitute:** After the RI-ISI is established, all examinations required by the Risk-Informed methodology would be accomplished by the end of the Second Ten-Year Interval that is scheduled for completion on April 4, 2008.

### Technical Justification and Data to Support the Determination:

NRC Information Notice 98-44 titled, "Ten-Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping," states that the probabilistic risk assessment technology in NRC regulatory activities should be increased to the extent



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supported by state of the art methods and data and in a manner that complements the NRC's deterministic approach. Basically, this information combined with risk-assessment techniques and associated data, can be used to develop a more effective approach to the ISI program, specifically the piping. This program is practical and provides an acceptable level of quality and safety, as required by paragraph (a)(3)(i) of 10 CFR 50.55a.

**Reference:**

(1) NRC Information Notice 98-44

