



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 3, 2017

Mr. John Dent, Jr.
Site Vice President
Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
600 Rocky Hill Road
Plymouth, MA 02360-5508

SUBJECT: PILGRIM NUCLEAR POWER STATION – ISSUANCE OF RELIEF
REQUESTS PNPS-ISI-004 AND PNPS-ISI-005 FOR RELIEF FROM AMERICAN
SOCIETY OF MECHANICAL ENGINEERS CODE, SECTION XI, VOLUMETRIC
EXAMINATION REQUIREMENTS (CAC NOS. MF8095 AND MF8096)

Dear Mr. Dent:

By letter dated June 29, 2016, as supplemented by letter dated November 18, 2016 (Agencywide Documents Access and Management System Accession Nos. ML16188A269 and ML16333A005, respectively), Entergy Nuclear Operations, Inc. (Entergy or the licensee) submitted to the U.S. Nuclear Regulatory Commission (NRC) Relief Requests PNPS-ISI-004 and PNPS-ISI-005 requesting relief from the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, volumetric examination requirements at the Pilgrim Nuclear Power Station (PNPS).

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g)(5)(iii), Entergy requested relief from the “essentially 100 percent” volumetric coverage requirements of ASME Code, Section XI, for the subject welds on the basis that the Code requirement is impractical.

The NRC staff concludes, as set forth in the enclosed safety evaluations, that ASME Code examination coverage requirements are impractical for the subject welds listed in Relief Requests PNPS-ISI-004 and PNPS-ISI-005. The NRC staff concludes that the examinations performed, to the extent practical, provide reasonable assurance of structural integrity of the subject components. The NRC staff has further determined that granting Relief Requests PNPS-ISI-004 and PNPS-ISI-005, in accordance with 10 CFR 50.55a(g)(6)(i), is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest, given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Therefore, the NRC staff grants Relief Requests PNPS-ISI-004 and PNPS-ISI-005, pursuant to 10 CFR 50.55a(g)(6)(i), for the fourth 10-year inservice inspection interval, July 1, 2005, to June 30, 2015, at PNPS.

J. Dent, Jr.

- 2 -

Relief Requests PNPS-ISI-001 through PNPS-ISI-003 will be handled in separate correspondence.

If you have any questions, please contact the project manager, John G. Lamb, at (301) 415-3100 or John.Lamb@nrc.gov.

Sincerely,

/RA by EBrown for/

Douglas A. Broaddus, Chief
Special Projects and Process Branch
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosures:

1. Safety Evaluation for Relief Request PNPS-ISI-004
2. Safety Evaluation for Relief Request PNPS-ISI-005

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUEST PNPS-ISI-004

FOR THE FOURTH 10-YEAR INSERVICE INSPECTION INTERVAL

ENTERGY NUCLEAR OPERATIONS, INC.

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

By letter dated June 29, 2016, as supplemented by letter dated November 18, 2016 (Agencywide Documents Access and Management System Accession Nos. ML16188A269 and ML16333A005, respectively), Entergy Nuclear Operations, Inc. (Entergy or the licensee), submitted Relief Request PNPS-ISI-004 from the "essentially 100 percent" volumetric coverage requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," for two welds, due to access limitations at the Pilgrim Nuclear Power Station (PNPS). The request for relief applies to the fourth 10-year inservice inspection (ISI) interval, which started on July 1, 2005, and ended on June 30, 2015.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), Entergy requested relief from the "essentially 100 percent" volumetric coverage requirements of ASME Code, Section XI, for the subject welds on the basis that the Code requirement is impractical.

2.0 REGULATORY REQUIREMENTS

The licensee has requested relief from ASME Code requirements pursuant to 10 CFR 50.55a(g)(5)(iii). Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, to the extent practical, within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals complies with the requirements in the latest edition and addenda of Section XI of the ASME Code, which was incorporated by reference in 10 CFR 50.55a(b), 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein.

The regulation in 10 CFR 50.55a(g)(5)(iii) states, in part, that licensees may determine that conformance with certain ASME Code requirements is impractical and that the licensee shall notify the U.S. Nuclear Regulatory Commission (NRC or the Commission) and submit information in support of the determination. Determination of impracticality in accordance with this section must be based on the demonstrated limitations experienced when attempting to comply with the Code requirements during the ISI interval for which the request is being submitted. Requests for relief made in accordance with this section must be submitted to the NRC no later than 12 months after the expiration of the initial 120-month inspection interval or subsequent 120-month inspection interval for which relief is sought.

The regulation in 10 CFR 50.55a(g)(6)(i) states that the Commission will evaluate determinations under paragraph (g)(5) of this section that Code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines are authorized by law and will not endanger life or property or the common defense and security, and is otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Based on the above, and subject to the following technical evaluation, the NRC staff finds that regulatory authority exists for the licensee to request, and the Commission to grant, relief and impose such alternative requirements as it determines are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

3.0 TECHNICAL EVALUATION

3.1 The Licensee's Relief Request

3.1.1 Code of Record

For weld DC-10-F10R, the inspections were conducted using ASME Code, Section XI, 1998 Edition with 2000 Addenda. For weld DC-14-F31, the inspections were conducted using ASME Code, Section XI, 2001 Edition with 2003 Addenda.

Entergy is also using ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds, Section XI, Division 1." Code Case N-460 states, in part, that when the entire examination volume or area cannot be examined, a reduction in examination coverage may be accepted, provided the reduction in coverage for that weld is less than 10 percent. ASME Code Case N-460 is listed in Table 1, "Acceptable Section XI Code Cases," of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1."

3.1.2 Components Covered by Relief Request

Relief Request PNPS-ISI-004 covers two Class 2 Category C-F-1, "Pressure Retaining Welds in Austenitic Stainless Steel or High Alloy Piping," Item Number C5.11, circumferential austenitic butt welds. Weld DC-10-F10R is part of the residual heat removal system, and weld DC-14-F31 is part of the core spray system.

Table 1: Welds Covered in Relief Request PNPS-ISI-004

Weld ID	Description	Pipe Material	Valve Material	Coverage Obtained
DC-10-F10R	18" Pipe-to-Valve Weld	18" A358 Grade TP304	A351 Grade CF8M	51.19%
DC-14-F31	10" Pipe-to-Valve Weld	10" A376 Grade TP304	A351 Grade CF8M	50.00%

3.1.3 Code Requirements

ASME Code, Section XI, Table IWC-2500-1, Examination Category C-F-1, Item Number C5.11, requires a volumetric examination of essentially 100 percent of the examination volume, as depicted in Figure IWC-2500-7, as applicable.

3.1.4 Reason and Basis for Relief

During ultrasonic examination of the austenitic stainless steel piping welds listed in Attachment 6, Table 4-1 of the licensee's letter dated June 29, 2016, greater than 90 percent coverage of the required examination volume could not be obtained. Examinations were performed utilizing a Performance Demonstration Initiative, Appendix VIII, Supplement 2, qualified procedure specific to austenitic piping welds.

Due to the geometric configuration of the components, effective volumetric examination could only be performed from the pipe side of the weld. The 45-degree, 60-degree shear, and 60-degree refracted longitudinal beam angles used in the axial and circumferential direction were not able to achieve greater than 90 percent Code-required volume of the austenitic stainless steel circumferential welds as required by Code Case N-460.

The licensee claims that it is impractical to obtain greater examination coverage on these welds. To effectively obtain significant additional coverage, it would necessitate modification and/or replacement of the component. The examinations performed on the subject welds, in addition to the examination of similar welds contained in the program, would detect generic degradation if it existed, demonstrating an acceptable level of integrity.

3.2 NRC Staff Evaluation

The licensee is requesting relief from the "essentially 100 percent" examination requirements for two Class 2 pipe to valve welds. However, for the subject welds, complete ultrasonic test examinations are restricted by weld geometric configuration and a scan limitation caused by an adjacent drain line on weld DC-10-F10R. In order to effectively increase the examination coverage, pipe to valve weld and attached drain line on DC-10-F10R would require design modifications or replacement. This would place a burden on the licensee.

As shown in the sketches and technical descriptions included in the licensee's submittals, examination of the welds DC-10-F10R and DC-14-F31 has been performed to the extent practical, with Entergy obtaining coverage of 51.19 percent and 50 percent, respectively, of the ASME Code-required inspection volume. The inspections included the use of 45-degree and 60-degree shear waves and 60-degree longitudinal waves, which cover the pipe side of the weld and the weld itself.

While only 50 percent of each of the welds was able to be examined using Appendix VIII qualified inspection techniques due to the presence of the weld crown and the valve geometry, additional "best effort" examinations were performed. For the valve side of the weld, the weld only was inspected using "best effort" 60-degree longitudinal and shear waves. When the "best effort" coverage is included with the ASME Code coverage, the inspected area increases to 98 percent for weld DC-10-F10R and 100 percent for weld DC-14-F31. The valves are made of C8M, a cast austenitic material, which is challenging to ultrasonically inspect. This inspection from the far side of the weld would not be able to reliably detect small flaws but may be able to detect large circumferential flaws, if they were present. There are no instances of cracking occurring in cast stainless valves in the nuclear industry to date.

The licensee has shown that it is impractical to meet the ASME Code, Section XI, required preservice volumetric examination coverage for the subject replacement welds due to the geometry of the components. Based on the operating experience for the components and the examinations performed, it is concluded that if significant service-induced degradation were occurring in the subject welds, there is reasonable assurance that evidence of it would have been detected. As such, the NRC staff further concludes that there is reasonable assurance of structural integrity of the subject welds based on the examinations that have been performed.

4.0 CONCLUSION

The NRC staff has reviewed Entergy's submittals and concludes that ASME Code examination coverage requirements are impractical for the subject welds listed in Relief Request PNPS-ISI-004. The NRC staff concludes that the examinations performed, to the extent practical, provide reasonable assurance of structural integrity of the subject components. The NRC staff has further determined that granting Relief Request PNPS-ISI-004, in accordance with 10 CFR 50.55a(g)(6)(i), is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest, given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Therefore, the NRC staff grants Relief Request PNPS-ISI-004 pursuant to 10 CFR 50.55a(g)(6)(i), for the fourth 10-year ISI interval from July 1, 2005, to June 30, 2015, at PNPS.

All other ASME Code, Section XI requirements for which relief was not specifically requested and approved in the subject request for relief remains applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: S. Cumblidge

Date: April 3, 2017



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUEST PNPS-ISI-005

FOR THE FOURTH 10-YEAR INSERVICE INSPECTION INTERVAL

ENTERGY NUCLEAR OPERATIONS, INC.

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

By letter dated June 29, 2016, as supplemented by letter dated November 18, 2016 (Agencywide Documents Access and Management System Accession Nos. ML16188A269 and ML16333A005, respectively), Entergy Nuclear Operations, Inc. (Entergy or the licensee) submitted Relief Request PNPS-ISI-005 from the "essentially 100 percent" volumetric coverage requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," for eight welds, due to access limitations at the Pilgrim Nuclear Power Station (PNPS). The request for relief applies to the fourth 10-year inservice inspection (ISI) interval, which started on July 1, 2005, and ended on June 30, 2015.

Specifically, pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR) 50.55a(g)(5)(iii), Entergy requested relief from the "essentially 100 percent" volumetric coverage requirements of ASME Code Section XI for the subject welds on the basis that the code requirement is impractical.

2.0 REGULATORY EVALUATION

Entergy has requested relief from ASME Code requirements pursuant to 10 CFR 50.55a(g)(5)(iii). Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals complies with the requirements in the latest edition and addenda of Section XI of the ASME Code, which was incorporated by reference in 10 CFR 50.55a(b), 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein.

The regulation in 10 CFR 50.55a(g)(5)(iii) states, in part, that licensees may determine that conformance with certain ASME Code requirements is impractical and that the licensee shall notify the U.S. Nuclear Regulatory Commission (NRC or the Commission) and submit information in support of the determination. Determination of impracticality in accordance with this section must be based on the demonstrated limitations experienced when attempting to comply with the Code requirements during the ISI interval for which the request is being submitted. Requests for relief made in accordance with this section must be submitted to the NRC no later than 12 months after the expiration of the initial 120-month inspection interval or subsequent 120-month inspection interval for which relief is sought.

The regulation in 10 CFR 50.55a(g)(6)(i) states that the Commission will evaluate determinations under paragraph (g)(5) of this section that Code requirements are impractical. The Commission may grant such relief and may impose such alternative requirements as it determines are authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Based on the above, and subject to the following technical evaluation, the NRC staff finds that regulatory authority exists for the licensee to request, and the Commission to grant, relief and impose such alternative requirements as it determines are authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

3.0 TECHNICAL EVALUATION

3.1 The Licensee's Relief Request

3.1.1 Code of Record

Welds 2R-HB-3 and 10R-IB-14 were inspected using ASME Code, Section XI, 1998 Edition with 2000 Addenda, and the remaining welds were examined using ASME Code, Section XI, 2001 Edition with 2003 Addenda.

Entergy is also using ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds, Section XI, Division 1." Code Case N-460 states, in part, that when the entire examination volume or area cannot be examined, a reduction in examination coverage may be accepted, provided the reduction in coverage for that weld is less than 10 percent. ASME Code Case N-460 is listed in Table 1, "Acceptable Section XI Code Cases," of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1."

3.1.2 Components Covered by Relief Request

Relief Request PNPS-ISI-005 covers Category R-A, "Risk Informed Piping Welds," Inspection Item R1.20, "Elements Not Subject to a Damage Mechanism," and R1.11, "Elements Subject to Thermal Fatigue," circumferential austenitic butt welds. The welds are described in Tables 1 and 2 of this safety evaluation. Welds 14-A-10A and 14-B-10A are dissimilar metal (DM) welds.

Table 1: Category R-A Inspection Item R1.20 Welds

Weld ID	Item Description	Pipe Material	Second Component and Material	Coverage Obtained
2R-HB-3	22" Cross-to-Header Weld	SA354 Grade TP316	Pipe - SA354 Grade TP316	83.57%
12-0-24	6" Pipe-to Flued Head Weld	SA376 Grade TP304	Flued Head - A403 Grade WP304	50.00%
14-A-10A	10" Valve-to-Pipe DM Weld	A106 Grade B	Valve - A351 Grade CF8M	28.40%
14-B-10A	10" Valve-to-Pipe DM Weld	A106 Grade B	Valve - A351 Grade CF8M	24.20%

Table 2: Category R-A Inspection Item R1.11 Welds

Weld ID	Item Description	Pipe Material	Second Component and Material	Coverage Obtained
10R-IA-6	Pipe-to-Valve Weld	A358 Grade TP304	Valve - A351 Grade CF8M	50.00%
10R-IA-7	Pipe-to-Valve Weld	A358 Grade TP304	Valve - A351 Grade CF8M	71.88%
10R-IB-14	18" Pipe-to-Flued Head Weld	A358 Grade TP304	Flued Head - A403 Grade WP304	78.62%
14R-A-11	10" Pipe-to-Valve Weld	SA358, Grade TP316	Valve - A351 Grade CF8M	50.00%

3.1.3 Code Requirements

ASME Code, Section XI, Code Case N-716, Examination Category R-A, Item R1.11, requires a volumetric examination of risk-informed piping weld volume. Examination Category R-A, Item R1.20, requires a volumetric examination of the risk-informed piping weld volume.

3.1.4 Reason and Basis for Relief

During ultrasonic examination of the Appendix VIII circumferential piping welds listed in Tables 1 and 2 above, greater than 90 percent coverage of the required examination volume could not be obtained. Examinations were performed utilizing Entergy-approved procedures specific to austenitic stainless steel piping welds.

Due to the geometric configuration of the components, effective volumetric examination could only be performed as noted in Tables 1 and 2. The 45-degree, 60-degree, and 70-degree beam angles use in the axial and circumferential direction were not able to achieve greater than 90 percent Code-required volume as required by Code Case N-460.

To effectively perform any significant additional Code-allowable ultrasonic examinations, modification and/or replacement of the component would be required. The examinations performed on the subject items, in addition to the examination of other piping welds contained in the ISI program, would detect generic degradation if it existed, and therefore, demonstrating an acceptable level of integrity.

3.2 NRC Staff Evaluation

The licensee is requesting relief from the “essentially 100 percent” examination requirements for eight Class I welds. However, for the subject welds, complete ultrasonic test examinations are restricted by weld geometric configurations. In order to effectively increase the examination coverage, the welds would require design modifications or replacement. This would place a burden on Entergy.

As shown in the sketches and technical descriptions included in the licensee’s submittals, examination of the welds has been performed to the extent practical, with Entergy obtaining coverage ranging from 24.2 percent to 83.7 percent, respectively, of the ASME Code-required inspection volume. The inspections included the use of 45-degree and 60-degree shear waves and 60-degree longitudinal waves, which cover the pipe side of the weld and the weld itself.

Weld 2R-HB-3, which is in the recirculation system, is a 22" austenitic header to cross weld. Coverage is limited due to single sided exam at 0 degrees and 180 degrees, with some areas fully inspectable. No relevant indications were recorded. Total coverage was 83.57 percent. The coverage obtained provides reasonable assurance that significant degradation would have been detected if it were present.

Weld 12-0-24 is an austenitic pipe-to flued dead weld in the reactor water cleanup system. Coverage is limited due to single-sided exam. No flaw indications were found in the examination. The total code examination volume was 50 percent, and the total area scanned, including best effort, is 77.9 percent. The coverage obtained provides reasonable assurance that significant degradation would have been detected if it were present.

Welds 14-A-10A and 14-B-10A are valve-to-pipe dissimilar metal welds in the core spray system. The core spray system carbon steel pipe to stainless steel valve was made utilizing nickel-alloy 182 weld material. Code coverage was 28.4 percent for weld 14-A-10A and 24.2 percent for weld 14-B-10A. No indications associated with stress corrosion cracking were recorded. The weld root geometry was imaged 360 degrees with the phased array sector scan using angles greater than the maximum 50-degree beam angle defined for coverage. Code coverage was 28.4 percent. Four other welds in the core spray system were inspected in previous inspections with greater than 90 percent coverage, and no indications were discovered in these welds. Based on the examination coverage, operating history, and the additional welds examined with full coverage, there is reasonable assurance that if there was active degradation in these welds, it would have been detected.

Weld 10R-IA-6 is a residual heat removal (RHR) system stainless steel pipe to stainless steel valve welds utilizing stainless steel weld metal. Examination coverage is limited on these welds due to the pipe to component geometry. The code coverage obtained is 50 percent, with 100 percent of the weld covered by “best effort” examinations. The coverage obtained provides reasonable assurance that significant degradation would have been detected if it were present.

Weld 10R-IA-7 is a pipe-to-valve weld RHR system stainless steel pipe to stainless steel valve welds utilizing stainless steel weld metal. Examination coverage is limited on these welds due to the pipe to component configurations. Qualified examination coverage could only be claimed for the base material and weld heat-affected zone on the pipe side. The Code coverage obtained is 71.88 percent, and 100 percent of the weld is covered by “best effort” examination. The coverage obtained provides reasonable assurance that significant degradation would have been detected if it were present.

The 10R-IB-14 pipe-to-flued head weld coverage is in the RHR system, and coverage is limited due to a single-sided exam. Root geometry and inside diameter (ID) undercut were recorded intermittently around the weld, but no indications of cracking were detected. The code coverage obtained was 78.62 percent, and 100 percent of the weld is covered by "best effort" examination. The coverage obtained provides reasonable assurance that significant degradation would have been detected if it were present.

The 14R-A-11 pipe-to-valve weld, core spray system coverage is limited due to single-sided exam. No relevant indications were recorded. The code coverage obtained was 50 percent, and 100 percent of the weld is covered by "best effort" examination. The coverage obtained provides reasonable assurance that significant degradation would have been detected if it were present.

Entergy has shown that it is impractical to meet the ASME Code, Section XI, required preservice volumetric examination coverage for the subject replacement welds due to the geometry of the components. Based on the operating experience for the components and the examinations performed, it is concluded that if significant service-induced degradation were occurring in the subject welds, there is reasonable assurance that evidence of it would have been detected. As such, the NRC staff further concludes that there is reasonable assurance of structural integrity of the subject welds based on the examinations that have been performed.

4.0 CONCLUSION

The NRC staff has reviewed Entergy's submittals and concludes that ASME Code examination coverage requirements are impractical for the subject welds listed in Relief Request PNPS-ISI-005. Based on the volumetric and/or surface coverage obtained, it is also concluded that if significant service-induced degradation were occurring, there is reasonable assurance that evidence of it would have been detected by the examinations that were performed. Therefore, the NRC staff concludes that there is reasonable assurance of structural integrity of the subject welds based on the examinations that have been performed and that granting relief, pursuant to 10 CFR 50.55a(g)(6)(i), is authorized by law and will not endanger life or property, or the common defense and security, and is otherwise in the public interest, given due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility.

Therefore, the NRC staff grants Relief Request PNPS-ISI-005 pursuant to 10 CFR 50.55a(g)(6)(i), for the fourth 10-year ISI interval, from July 1, 2005, to June 30, 2015, at PNPS.

All other ASME Code, Section XI requirements for which relief was not specifically requested and approved in the subject request for relief remains applicable, including third-party review by the Authorized Nuclear Inservice Inspector.

Principal Contributor: S. Cumblidge

Date: April 3, 2017

SUBJECT: PILGRIM NUCLEAR POWER STATION – ISSUANCE OF RELIEF REQUESTS PNPS-ISI-004 AND PNPS-ISI-005 FOR RELIEF FROM AMERICAN SOCIETY OF MECHANICAL ENGINEERS CODE, SECTION XI, VOLUMETRIC EXAMINATION REQUIREMENTS (CAC NOS. MF8095 AND MF8096) DATED APRIL 3, 2017

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