

February 11, 1993

Docket Nos. 50-387
and 50-388

Mr. Harold W. Keiser
Senior Vice President-Nuclear
Pennsylvania Power and Light
Company
2 North Ninth Street
Allentown, Pennsylvania 18101

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Dear Mr. Keiser:

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION (SSES), UNIT NOS. 1 AND 2,
FIRST 10-YEAR INSERVICE INSPECTION (ISI) PROGRAM PLAN (PLA-3758)
(TAC NOS. M83342 AND M83343)

Your letter of April 21, 1992, transmitted Revision 2 to the Unit 1 ISI Program Plan and Revision 1 to the Unit 2 ISI Program Plan for the First 10-Year Inspection Interval. The NRC has been reviewing this submittal with the technical assistance of our contractors, Idaho National Engineering Laboratory (INEL). We have determined that additional information, identified in the enclosure to this letter, is necessary to complete our evaluation of your relief requests.

To expedite our review process, would you please send a copy of your response to our contractor, INEL, at the following address:

Mr. Boyd W. Brown
EG&G Idaho, Inc.
INEL Research Center
2151 North Boulevard
PO Box 1625
Idaho Falls, Idaho 83415-2209

Sincerely,

Original signed by
Richard J. Clark

Richard J. Clark, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Additional Information

cc w/enclosure:
See next page

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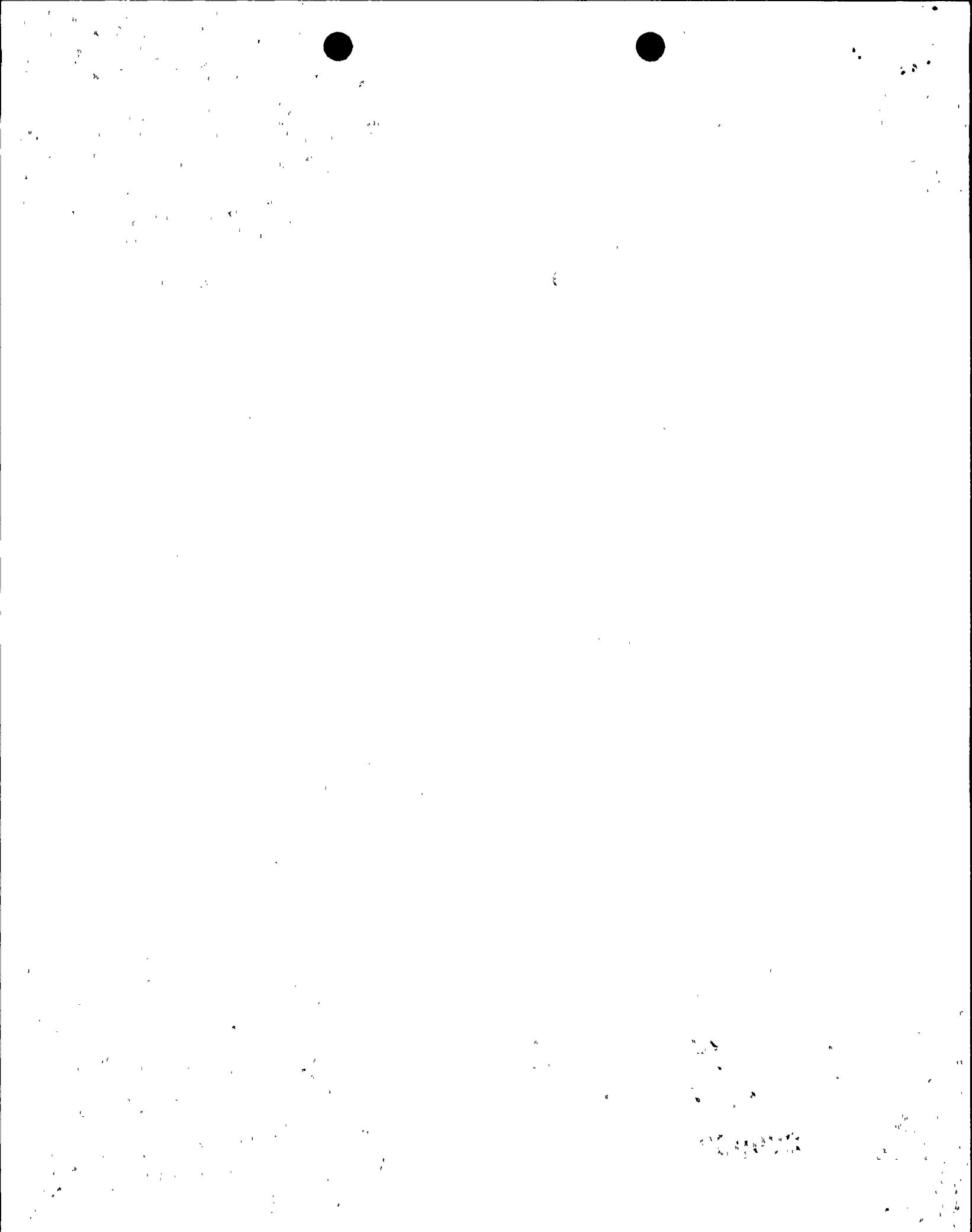
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

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Senior Vice President-Nuclear
Pennsylvania Power and Light
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Allentown, Pennsylvania 18101

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INEL Research Center
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Idaho Falls, Idaho 83415-2209

Sincerely,

A handwritten signature in cursive script, appearing to read "Richard J. Clark".

Richard J. Clark, Senior Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Request for Additional Information

cc w/enclosure:
See next page

Mr. Harold W. Keiser
Pennsylvania Power & Light Company

Susquehanna Steam Electric Station,
Units 1 & 2

cc:

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Harrisburg, Pennsylvania 17108-1266

Request for Additional Information
First 10-Year Inservice Inspection Interval
Susquehanna Steam Electric Station, Units 1 and 2

Docket Nos. 50-387 and 50-388

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the initial 120-month inspection interval comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the date of issuance of the operating license, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein. The Licensee, Pennsylvania Power and Light Company (PP&L), has prepared the Susquehanna Steam Electric Station (SSES), Unit 1, Inservice Inspection (ISI) Program Plan, Revision 1, to meet the requirements of the 1980 Edition through Winter 1980 Addenda (80W80) of Section XI of the ASME Code except that the extent and frequency of examination for Code Class 2 piping welds in the Residual Heat Removal (RHR), Emergency Core Cooling (ECC), and Containment Heat Removal (CHR) Systems has been determined by the 1974 Edition through Summer 1975 Addenda (74S75) as required by 10 CFR 50.55a(b)(2)(iv)(A). PP&L prepared the SSES, Unit 2 ISI Program Plan, Revision 1, to meet the requirements of the 1980 Edition through Winter 1981 Addenda (80W81) of Section XI of the ASME Code, except, that as with Unit 1, the extent and frequency of examination for Code Class 2 piping welds in the Residual Heat Removal (RHR), Emergency Core Cooling (ECC), and Containment Heat Removal (CHR) Systems has been determined by the 1974 Edition through Summer 1975 Addenda (74S75) as required by 10 CFR 50.55a(b)(2)(iv)(A).

As required by 10 CFR 50.55a(g)(5), if the licensee determines that certain Code examination requirements are impractical and requests relief, the licensee shall submit information to the Nuclear Regulatory Commission (NRC) to support that determination. The staff has reviewed the available information in the SSES, Units 1 and 2 First 10-Year Interval ISI Program Plan, submitted April 21, 1992, including requests for relief from the ASME Code Section XI requirements that the licensee has determined to be impractical.

2. Additional Information Required

The staff has concluded that the following information and/or clarification is required in order to complete the review of the ISI Program Plan:

- 1) Section 10.0: Note 3 states, in part, that for Class 2 piping welds, a percentage of the "welds" on a single stream or the equivalent of one loop shall be selected for examination. Footnote 1 states: "Pipe-to-pipe welds that are at structural discontinuities and dissimilar metal pipe-to-pipe welds shall be included in the weld total. All other pipe-to-pipe welds shall not be included." The second sentence of the footnote implies that pipe-to-pipe welds are not included in the total weld population. Please provide a discussion regarding this statement and why "all other pipe-to-pipe welds" are not included in the total population.
- 2) Request for Relief 1RR-13 and 2RR-11: Estimated coverage for each of the subject welds has been provided in the submittal. However, it is also stated that 24 of 30 of the subject nozzle-to-vessel welds were examined with remote automated equipment and that nozzle configuration has a more pronounced effect on the remote examination (as opposed to the manual exams). Are the estimates provided based on the manual, remote or actual percentages of the Code-required volume examined? Please clarify the percentage of the Code-required volume that can and will be examined.
- 3) Request for Relief 1RR-14 and 2RR-12: A VT-1 visual examination is proposed in lieu of the Code-required surface or volumetric examination of eight Reactor Pressure Vessel (RPV) stabilizer brackets. Please identify the type of integral attachments involved, and provide a more detailed description and drawings if necessary. If the design is similar to Figure IWB-2500-13 or -14, can visual examination of the internal surface be performed? What percentages of the RPV stabilizer brackets can and will receive a VT-1 visual examination?
- 4) Request for Relief 1RR-15: Relief is requested from performing the Code-required examinations of Code Item B9.11 and B5.10 piping welds. These items require both surface and volumetric examinations. Please clarify what examinations relief is requested from (both surface and volumetric examinations?). If relief is requested from both examinations, please provide an estimate of the coverage of both surface and volumetric examinations.
- 5) Request for Relief 2RR-13: Relief is requested from performing a portion of the Code-required examinations for six Class 1 piping welds. These welds require both surface and volumetric examinations. Please clarify what relief is requested (for both surface and

volumetric examinations?). If relief is requested for both examinations, please provide an estimate of the coverage for both the surface and volumetric examinations that can and will be completed.

A note referring to Weld DBA2011-FW-50 states that a preservice examination was performed following a plant repair/replacement. Is relief being requested from a preservice examination requirement? Please provide a more detailed explanation regarding this weld.

- 6) Request for Relief 1RR-17 and 2RR-15: Relief is requested from performing portions of the Code-required surface examinations for a number of integrally welded supports attached to Class 2 piping. However, the terminology "wrapper plates" does not adequately describe the subject integral attachments. Please provide a more detailed description, including drawings if necessary, and further justification for the granting of relief.
- 7) Request for Relief 1RR-20 and 2RR-17: Relief is requested from the Code-required hydrostatic test for subject Class 2 components and piping. In lieu of a hydrostatic test, a functional pressure test is proposed for a number of components in this relief request. Pressure tests at nominal system pressure are considered an acceptable alternative provided that hold time requirements are met (4 hours for insulated and 10 minutes for non-insulated components). Will these hold time requirements be met? Has this alternative been considered on a generic basis for Class 1 and 2 systems at SSES? In addition, it appears that Code Item Numbers do not correspond to the components described in Tables 2 1RR-20-1 and 2RR-17-1. Please check the Code Item Numbers of each component and revise Relief Requests 1RR-20 and 2RR-17 as necessary.
- 8) Request for Relief 1RR-21 and 2RR-18: Relief is requested from performing the volumetric examination, to the extent required by the Code, of the residual heat removal heat exchanger (RHRHX) nozzle-to-vessel weld. However, the description of the limitation does not provide adequate justification for the granting of relief. Additionally, it appears that the Code requirements could be met by examination of 24% of the other RHRHX nozzle weld. Please provide drawings, a more detailed description of the limitation, and a discussion on the option of examining a portion of the same weld on the other RHRHX.
- 9) Code Item Numbers: Code Item Numbers are necessary to determine the specific examination requirements of the Code. It was noted that a number of relief requests contained in Unit 1, Revision 2 and Unit 2 Revision 1 lack Code Item Numbers (e.g. 1RR-12, 1RR-16, 1RR-18, 2RR-10 and 2RR-14). Please provide the appropriate Code Item Numbers for these and other relief requests where item numbers may have been omitted.

- 10) Previously Evaluated Relief Request: Our letters of February 18, 1987 and February 12, 1987 on Units 1 and 2, respectively, transmitted our evaluation of your previous ISI program plan. The letters also granted relief from the examination requirements which we determined to be impractical to perform.

In our safety evaluations, we concluded that relief was not required for two relief requests for each unit, 1RR-3 and 1RR-10 for Unit 1 and 2RR-3 and 2RR-8 for Unit 2. All four of these relief requests were included in your April 21, 1992, submittal. Other licensees remove unnecessary relief requests from their plans during subsequent revisions. Please provide a discussion regarding the status of these and any other previously evaluated relief requests that may have been revised since the February 12 and 18, 1987, evaluations.



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