

CATEGORY 1

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9612030317 DOC: DATE: 96/11/27 NOTARIZED: NO DOCKET #
FACIL: 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylv 05000388
AUTH: NAME AUTHOR AFFILIATION
BYRAM, R.G. Pennsylvania Power & Light Co.
RECIP: NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Provides Rev 1 to Relief Request RR-13, sent to NRC staff in
ltr dtd 961028 re second 10-Yr insp program for Unit 2.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5
TITLE: OR Submittal: Inservice/Testing/Relief from ASME Code - GL-89-04

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTTR	ENCL		LTTR	ENCL
	PD1-2 LA	1	1	PD1-2 PD	1	1
	POSLUSNY, C	1	1			
INTERNAL:	ACRS	1	1	AEOD/SPD/RAB	1	1
	FILE CENTER 01	1	1	NRR/DE/EMEB	1	1
	NUDOCS-ABSTRACT	1	1	OGC/HDS2	1	0
	RES/DET/EIB	1	1	RES/DET/EMMEB	1	1
EXTERNAL:	LITCO ANDERSON	1	1	NOAC	1	1
	NRC PDR,	1	1			

NOTE TO ALL "RIDS" RECIPIENTS:
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
ROOM OWFN 5D-5 (EXT. 415-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 14 ENCL 13

C
A
T
E
G
O
R
Y
1
D
O
C
U
M
E
N
T



Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 610/774-5151

Robert G. Byram
Senior Vice President-Nuclear
610/774-7502
Fax: 610/774-5019

NOV 27 1996

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED REVISION NO. 1 TO RELIEF REQUEST
NO. RR-13 TO THE SECOND 10-YEAR INSERVICE
INSPECTION PROGRAM FOR SUSQUEHANNA
SES UNIT 2**

PLA-4536

FILE R41-2

Docket No. 50-388

Reference Letter (PLA-4514) from R. G. Byram (PP&L) to NRC Document Control Desk, 'Proposed Relief Request No. RR-13 to the Second 10-Year Inservice Inspection Program for Susquehanna SES Unit 2', dated October 28, 1996.

The purpose of this letter is to provide Revision No. 1 to Relief Request No. RR-13 which was sent to the NRC Staff in the above referenced letter. This letter supersedes the above referenced letter. During a recent review of the scope of work for the upcoming Unit 2 Eight Refueling and Inspection Outage (U2-8RIO), it was discovered that schedule relief for additional components should have been incorporated into Relief Request No. RR-13 for inspection during the U2-8RIO.

Revision No. 1 to Relief Request No. RR-13 requests schedule relief for certain components from the Code requirement IWX-2420, 'Successive Inspections'. Paragraph IWX 2420(a) of the Code requires that "the sequence of component examinations established during the first inspection interval shall be repeated during each successive inspection interval, to the extent practical." Pennsylvania Power & Light Company interprets this section to mean that components selected for examination during the second inservice inspection interval which were previously examined during the first inservice inspection interval (for Code credit) shall be scheduled for examination during the same period of the second interval as the examination was performed during the first interval. Susquehanna SES Unit 2 has a number of components scheduled for examination during the second inservice inspection interval which were previously examined during the first inservice inspection interval. For the components listed in the attached relief request, scheduling of component examination for the second interval to parallel the sequence established during the first interval represents a hardship and/or is impractical to implement. Relief is requested from meeting the requirements of Paragraph IWX-2420(a) of the

9612030317 961127
PDR ADDCK 05000388
G PDR

11/1
Rox



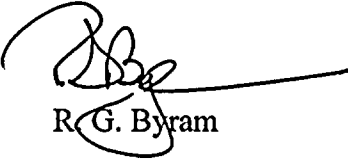
Small, faint text or markings in the middle right area.

Faint text or markings at the bottom right corner.

Code for the components listed. This relief is being sought for scheduling purposes only. The intent of this request is to perform the examinations only on a schedule differing from that prescribed by the Code.

If you have any questions, please call C. T. Coddington at (610) 774-7531.

Very truly yours,



R. G. Byram

Attachment

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector
Mr. C. Poslusny, NRC Sr. Project Manager

RELIEF REQUEST RR-13
REVISION NO. 1

I. RELIEF REQUEST APPLICABILITY

A. UNIT(S):	2
B. CODE EXAMINATION CATEGORY:	N/A
C. CODE ITEM NUMBER:	N/A
D. REFERENCES(S):	ASME Section XI, 1989 Edition, IWX-2420, Successive Inspections

ASME Section XI, 1989 Edition, 1990
Addenda, IWF-2420, Successive

Inspections

II. IDENTIFICATION OF COMPONENTS

This relief request applies to certain SSES Unit 2 Class 1 and 2 components and Class 1,2 and 3 component supports subject to the requirements of Paragraph IWX-2420(a) of the Code. These components and component supports were selected/examined during the first inservice inspection interval, and are also selected for nondestructive examination during the second inservice inspection interval, thereby invoking the Code requirements for successive inspections.

III. REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

Paragraph IWX 2420(a) of the Code requires that "the sequence of component examinations established during the first inspection interval shall be repeated during each successive inspection interval, to the extent practical." This is interpreted by the ISI program that components selected for examination during the second inservice inspection interval which were previously examined during the first inservice inspection interval (for Code credit) shall be scheduled for examination during the same period of the second interval as the examination was performed during the first interval. SSES Unit 2 has a number of components scheduled for examination during the second inservice inspection interval which were previously examined during the first inservice inspection interval. For the components listed in this relief request, scheduling of component examination for the second interval to parallel the sequence established during the first interval represents a hardship and/or is impractical to implement. Relief is requested from meeting the requirements of Paragraph IWX-2420(a) of the Code for the components listed. This relief is being sought for scheduling purposes only. The intent of this request is to perform the examinations only on a schedule differing from that prescribed by the Code.

Component Identification/Description	Examination Category/Item Number	Outage Currently Scheduled for Examination During Second Interval/Period	Outage Last Exam Performed/Period	Outage Relief for Examination During the Second Interval/Period
Vessel Vertical Weld BD	IWB-2500-1, B-A, B1.12	10RIO/2 nd	4RIO/2 nd	8RIO/1 st
Vessel Vertical Weld BE	IWB-2500-1, B-A, B1.12	10RIO/2 nd	4RIO/2 nd	8RIO/1 st
Vessel Vertical Weld BF	IWB-2500-1, B-A, B1.12	10RIO/2 nd	5RIO/3 rd	8RIO/1 st
Vessel Vertical Weld BN	IWB-2500-1, B-A, B1.12	12RIO/2 nd	6RIO/3 rd	8RIO/1 st
Vessel Circumferential Weld AB	IWB-2500-1, B-A, B1.11	10RIO/2 nd	4RIO/2 nd	8RIO/1 st
Vessel Circumferential Weld AC	IWB-2500-1, B-A, B1.11	10RIO/2 nd	4RIO/2 nd	8RIO/1 st
Nozzle N2J	IWB-2500-1, B-D, B3.90, B3.100	10RIO/2 nd	4RIO/2 nd	8RIO/1 st
Nozzle N3A	IWB-2500-1, B-D, B3.90, B3.100	10RIO/2 nd	4RIO/2 nd	8RIO/1 st
Nozzle N3B	IWB-2500-1, B-D, B3.90, B3.100	10RIO/2 nd	4RIO/2 nd	8RIO/1 st
Nozzle N5A	IWB-2500-1, B-D, B3.90, B3.100	9RIO/2 nd	5RIO/3 rd	8RIO/1 st
Nozzle N5B	IWB-2500-1, B-D, B3.90, B3.100	9RIO/2 nd	5RIO/3 rd	8RIO/1 st

IV. BASIS FOR RELIEF

There are a variety of situations which make the requirements of Paragraph IWX-2420(a) a hardship and/or impractical to implement. These situations are discussed in detail herein.

The fuel cycle for both SSES Units 1 and 2 has been changed from an 18 month fuel cycle to a 24 month fuel cycle beginning with the 9th cycle on Unit 2. This change in fuel cycles affects the established refueling outage sequence outages needed to accomplish required ISI program nondestructive examinations and, alters how the refueling outages fall within a particular inservice inspection period. SSES Unit 2 has one less refueling outage five refueling outages for the second inservice inspection interval verses six for the first interval in which to complete the nondestructive examinations necessary to satisfy the Unit 2 ISI program commitments. Given anticipated outage duration of 28 to 45 days, an increased inspection workload (as compared to previous outages) may not fit into the allotted inspection windows resulting in costly extended outages. Deviation from the requirements of Paragraph IWX-2420(a) for select components will allow the examination to meet the demands of the second inservice inspection interval and to optimize the examination efficiency.



Examination schedules during the first inservice inspection interval were done without the taking into account of successive inspection scheduling. The greater flexibility allowed examination to be deferred to alternate outages to accommodate for special circumstances such as ALARA/access provisions or special outage work planning. These circumstances may no longer exist for the second interval. Also, experience gained during the first interval may indicate that the first interval scheduling was not the most efficient scheduling of examination or resources. For example, it is more efficient to ultrasonically examine several welds of the same pipe size requiring the same site support (scaffolding, insulation removal, etc.) at the same time rather than distributing the welds over several periods to parallel the first interval. Note that the first interval scheduling may have been done so to accommodate a unique set of circumstances that no longer affect the examinations. Deviation from the requirements of Paragraph IWX-2420(a) will allow second interval scheduling of examination to take advantage of lessons learned from the first interval and/or make the most efficient use of inspection resources.

By reallocating the examinations listed above, we believe that we can significantly reduce personnel radiation exposure associated with performing the exams by as much as 30 man-rem. This reduction can be realized because we are performing these inspections prior to the introduction of hydrogen water chemistry (HWC) to SSES Unit 2. Additionally, cost savings will be realized by reducing by one outage the setup of the GE GERIS inspection system.

Selective deviation from the Code successive inspection requirements does not affect plant quality or safety. The intent of the successive inspection requirements is to preclude components from being examined too soon after a previous examination or from exceeding ten years between examinations. In this situation we feel that it is more conservative from a Nuclear Safety perspective to examine these welds earlier than ten years versus extending them past the ten year interval between inspections. Also of note is that a majority of SSES Unit 2 components selected for examination during the second inservice interval do comply with Paragraph IWX-2420(a) providing examination results over time which meet the intent of Section XI.

V. ALTERNATE PROVISIONS

For the components affected by this relief request, scheduling of examinations will be allowed to deviate from the requirement of Paragraph IWX-2420(a).

