

CATEGORY 1

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SUBJECT: Forwards relief request RR-17 from specific min illumination & max distance requirements of IWL-2210 & IWA-2310 for direct exam when performing remote exams of class CC concrete containments.

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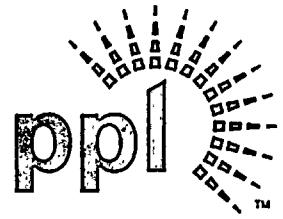
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U.S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED RELIEF REQUEST NO. RR-17 TO
THE FIRST 10-YEAR PRIMARY CONTAINMENT
INSERVICE INSPECTION PROGRAM FOR
SUSQUEHANNA SES UNITS 1 & 2
PLA-4954**

FILE R41-2

Docket Nos. 50-387 and 50-388

The purpose of this letter is to request relief pursuant to the requirements of 10 CFR 50.55a(a)(3)(ii) based upon hardship and the requirements of ASME Section XI, 1992 Edition, 1992 Addendum, Paragraphs IWA-2210 and IWL-2310. Paragraphs IWA-2210 and IWL-2310 specify the minimum illumination and maximum distance requirements for direct examination of all concrete containment surfaces. Relief is requested from the specific minimum illumination and maximum distance requirements of IWL-2210 and IWA-2310 for direct examination when performing remote examinations of Class CC concrete containments.

Accessibility to higher elevations of the concrete containments makes it very difficult to obtain the specific minimum illumination and maximum distance requirements for direct examination of its surfaces. The installation of extensive scaffolding would be necessary and would provide only limited access due to restrictions and equipment interferences. Installation and removal of the necessary scaffolding would increase personnel radiation exposure and further risk personnel safety. The NRC recognized the difficulty of obtaining the minimum illumination and maximum distance requirements for steel containment structures by providing an alternative in 10 CFR 50.55a(b)(2)(x)(B) which states, "When performing remotely the visual examinations required by Subsection IWE, the maximum direct examination distance specified in Table IWA-2210-1 may be extended and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the conditions or indications for which the visual examination is performed can be detected at the chosen distance and illumination."

As permitted for metal containments, the minimum illumination and maximum examination distances for remote visual examination of the concrete containments will be controlled so that the conditions or indications for which the visual examinations are performed can be detected.

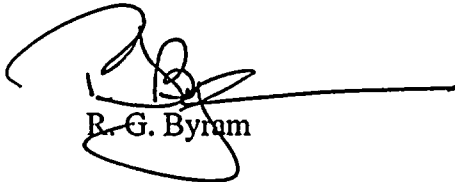
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We believe that the illumination and distance requirements for inspection places an undue hardship on the Susquehanna Steam Electric Station without providing additional safety assurance while adding additional exposure and outage duration. We believe that the alternative method(s) described will provide an adequate level of safety assurance while meeting the intent for regular inspections as prescribed in the ASME Code.

We request that this relief request be approved by January 15, 1999, in order to support the Unit 2 9th Refuel Outage which is scheduled to begin in March 1999. Should you have any questions, please contact C. T. Coddington at (717) 542-3294.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. G. Byram', with a long horizontal line extending to the right.

R. G. Byram

Attachment

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector
Mr. V. Nerses, NRC Sr. Project Manager



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RELIEF REQUEST RR-17

I. RELIEF REQUEST APPLICABILITY

- A. Unit(s): 1 and 2
- B. Code Examination Category: C-C, IWA-2210, IWL-2310
- C. Code Item Number: L1.11 and L1.12
- D. Code Reference: ASME, Section XI, 1992 Edition, 1992 Addendum
Visual Examination and Personnel Qualification

II. IDENTIFICATION OF COMPONENTS

This relief request applies to the illumination and examination distance requirements for remote inspection of ASME Code Class MC components for both Units 1 and 2.

III. REQUIREMENTS FROM WHICH RELIEF ARE REQUESTED

Accessibility to higher elevations of the concrete containments makes it very difficult to obtain the specific minimum illumination and maximum distance requirements for direct examination of its surfaces. The installation of extensive scaffolding would be necessary and would provide only limited access due to restrictions and equipment interferences. Installation and removal of the necessary scaffolding would increase personnel radiation exposure and further risk personnel safety.

IV. BASIS FOR RELIEF

The NRC recognized the difficulty of obtaining the minimum illumination and maximum distance requirements for steel containment structures by providing an alternative in 10 CFR 50.55a(b)(2)(x)(B) which states, "When performing remotely the visual examinations required by Subsection IWE, the maximum direct examination distance specified in Table IWA-2210-1 may be extended and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the conditions or indications for which the visual examination is performed can be detected at the chosen distance and illumination."

V. ALTERNATE PROVISIONS

As permitted for metal containments, the minimum illumination and maximum examination distances for remote visual examination of the concrete containments will be controlled so that the conditions or indications for which the visual examinations are performed can be detected.



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