

# CATEGORY 1

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SUBJECT: Forwards relief request RR-15 from requirements of performing successive insp of class MC repairs IAW paragraphs IWE-2420(b) & (c) of ASME, Section XI, 1992 Edition, Subsection IWE.

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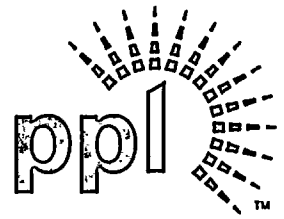
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**SUSQUEHANNA STEAM ELECTRIC STATION  
PROPOSED RELIEF REQUEST NO. RR-15 TO  
THE FIRST 10-YEAR PRIMARY CONTAINMENT  
INSERVICE INSPECTION PROGRAM FOR  
SUSQUEHANNA SES UNITS 1 & 2  
PLA-4952                      FILE R41-2**

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, Subsection IWE, Class MC, Paragraph IWE-2420 (b), which requires that repairs of Class MC Components are to be reexamined during the next inspection period. Paragraph IWE-2420(c) further requires that the repaired areas be reexamined in accordance with the augmented examination requirements of Examination Category E-C, for three consecutive periods. PP&L requests relief from the requirement of performing successive inspection of Class MC repairs in accordance with Paragraphs IWE-2420 (b) and (c).

When a repair restores a component to an acceptable condition, successive examinations are not warranted. The requirements of Class 1, 2, or 3 Components in Paragraphs IWB-2420 (b), IWC-2420 (b), or IWD-2420 (b) do not require a repair to be subjected to successive examinations. Thus, the successive examination requirement for repairs in accordance with IWE-2420 (b) and (c) constitute a burden without a compensating increase in quality or safety. As stated in the NRC/NEI/EPRI meeting notes from H. Asher to G. Bagchi dated January 13, 1998 in Item 7, "The staff believes that the successive examinations are required to monitor the flaws or degradations accepted by engineering evaluation (and not by repair). For repaired flaws evaluated and accepted by the requirements of IWA-4000, the staff does not believe that successive examinations are necessary."

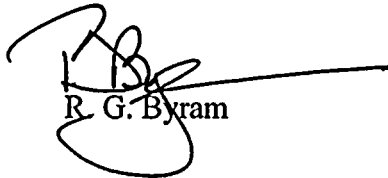
We believe that the requirement to perform successive inspection of Class MC repairs for three successive periods to be burdensome and places an undue hardship on the Susquehanna Steam Electric Station without providing additional safety assurance while adding additional exposure and outage duration. 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.

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PDR ADOCK 05000387  
Q PDR

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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.

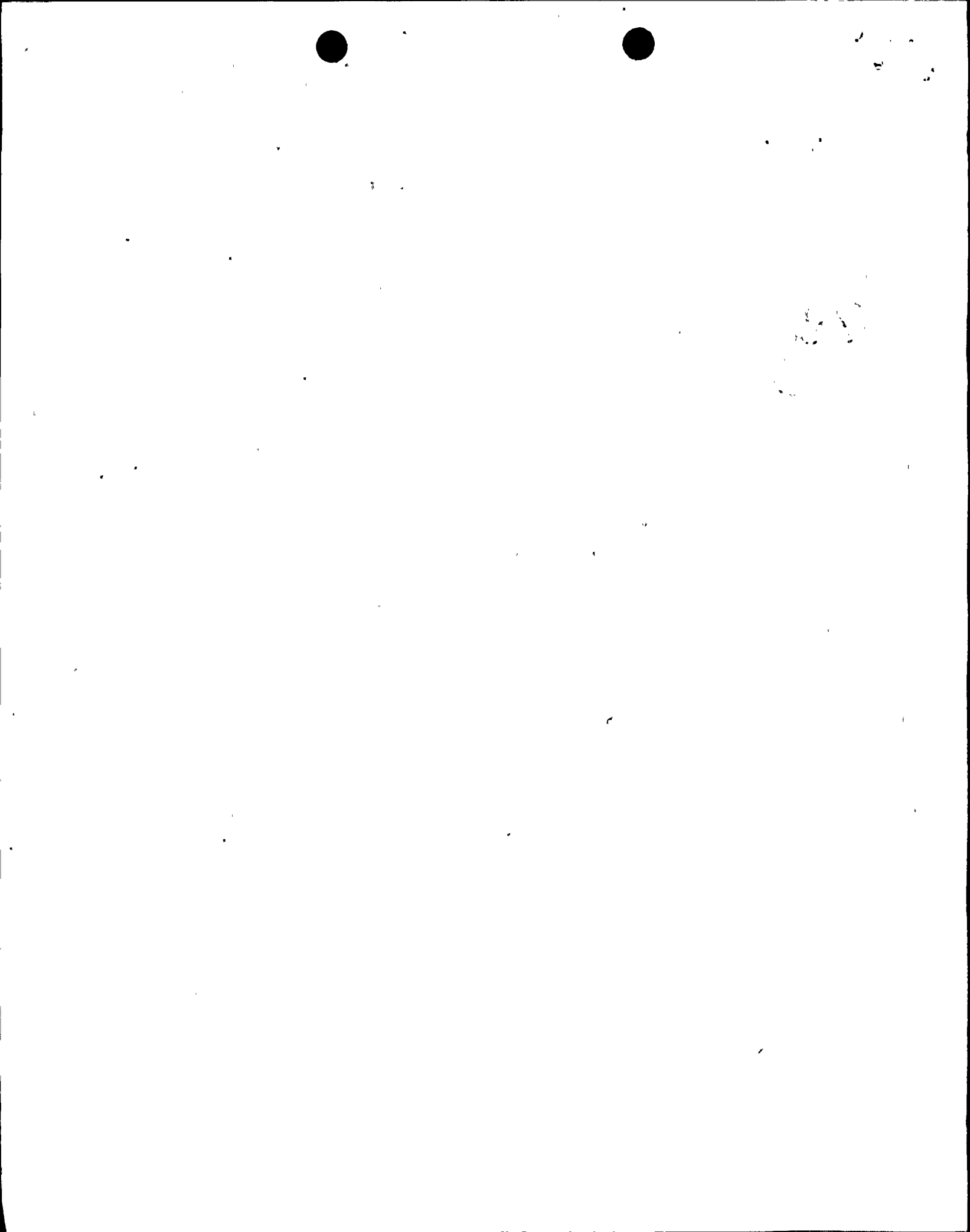
Sincerely,



R. G. Byram

Attachment

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



## RELIEF REQUEST RR-15

### I. RELIEF REQUEST APPLICABILITY

- A. Unit(s): 1 and 2  
B. Code Examination Category: IWE Class MC  
C. Code Item Number: N/A  
D. Code Reference: ASME, Section XI, 1992 Edition, 1992 Addenda,  
IWE-2420 (b) and 2420(c), Successive Examinations

### II. IDENTIFICATION OF COMPONENTS

This request is applicable to repairs of ASME Code Class MC components for both Units 1 and 2.

### III. REQUIREMENTS FROM WHICH RELIEF ARE REQUESTED

ASME Section XI, 1992 Edition, 1992 Addenda, requires in Paragraph IWE-2420 (b) that repairs of Class MC Components are to be reexamined during the next inspection period. Paragraph IWE-2420(c) further requires that the repaired areas be reexamined in accordance with the augmented examination requirements of Examination Category E-C, for three consecutive periods.

### IV. BASIS FOR RELIEF

Relief is requested from performing successive inspections of Class MC repairs in accordance with Paragraphs IWE-2420 (b) and (c).

When a repair restores a component to an acceptable condition, successive examinations are not warranted. The requirements of Class 1, 2, or 3 Components in Paragraphs IWB-2420 (b), IWC-2420 (b), or IWD-2420 (b) do not require a repair to be subjected to successive examinations. Thus, the successive examination requirement for repairs in accordance with IWE-2420 (b) and (c) constitute a burden without a compensating increase in quality or safety. As stated in the NRC/NEI/EPRI meeting notes from H. Asher to G. Bagchi dated January 13, 1998, in Item 7, "The staff believes that the successive examinations are required to monitor the flaws or degradations accepted by engineering evaluation (and not by repair). For repaired flaws evaluated and accepted by the requirements of IWA-4000, the staff does not believe that successive examinations are necessary."

### V. ALTERNATE PROVISIONS

Repairs of Class MC Components will be performed in accordance with IWA-4000 without performing successive examinations in accordance with IWE-2420 (b) and (c).