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SUBJECT: Requests approval to incorporate Code Case N-546,
"Alternative Requirements for Qualification of VT-2 Exam
Personnel, Section 11, Div 1," for use in ten year inservice
insp program.

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November 27, 1996

L-96-302
10 CFR 50.4
10 CFR 50.55a

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Inservice Inspection Plan
Second Ten-Year Interval
ASME Code Case N-546 - Request for Use

Pursuant to 10 CFR 50.55a, (Footnote 6) and 10 CFR 50.55a(a)(3), Florida Power and Light Company requests approval to incorporate Code Case N-546, *Alternative Requirements for Qualification of VT-2 Examination Personnel, Section XI, Division 1*, for use in the St. Lucie Unit 1 and Unit 2 Ten Year In Service Inspection Programs. Code Case N-546 was approved for use by ASME on August 24, 1995.

This Code Case is an alternative to the qualification requirements of IWA-2300 for VT-2 visual examination personnel. This alternative enables St. Lucie to utilize plant operators to perform VT-2 leak examinations during routine system pressure test walkdowns reducing the burden of costly contractor nondestructive examination (NDE) personnel. The proposed alternative qualification requirements will provide a reasonable assurance that personnel used for the examinations will have sufficient training. Thus an acceptable level of quality and safety will be achieved and public health and safety will not be endangered by allowing the proposed alternative qualification in lieu of the Code requirement.

FPL will meet the requirements contained in Code Case N-546 and will develop and implement formal procedures so that consistent VT-2 visual examinations are performed. Leakage evaluations will include an independent review and evaluation of findings by persons other than those that performed the VT-2 examinations. Finally, FPL will document and maintain records to verify that persons selected are qualified.

Use of Code Case N-546 allows experienced plant personnel such as licensed and non-licensed operators, local leak rate test personnel, system engineers, and inspection and nondestructive examination personnel to perform VT-2 visual examinations without having to be certified to comparable levels of competency defined in ANSI N45.2.6. The FPL individuals performing the visual examinations will be subject to the conditions provided in Code Case N-546.

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St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
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Specifically, if the code case is approved, the examination personnel will have at least forty (40) hours of plant walkdown experience, receive a minimum of four (4) hours of training on Section XI requirements and plant specific procedures for VT-2 visual examinations, and pass the vision test requirements of IWA-2321, 1995 edition. In addition to the requirements of the Code Case N-546, FPL will develop a procedure to assure that consistent VT-2 visual examinations are performed. FPL will proceduralize the requirement that an independent review and evaluation of the findings be performed by persons other than those that performed the VT-2 examinations. FPL will also implement a program that documents the qualifications, training, and visual acuity of persons selected to perform the VT-2 examinations and will maintain records that all of the requirements in the code case and specified herein, are met. This approach alleviates the need to contract certified VT-2 personnel to perform these examinations and reduces the administrative burden of maintaining a Section XI qualification and certification program for VT-2 examination personnel. The level of safety and quality will not decrease with the elimination of contract personnel and the use of qualified FPL personnel to determine if leakage is present. The qualification requirements in Code Case N-546, in conjunction with the additional commitments, are comparable to those qualifications required for VT-2 visual examiner certification. A copy of the Code Case is attached for your information.

Code Case approval is requested to support its use in the upcoming St. Lucie Unit 2 refueling outage scheduled to begin April 15, 1997. Please contact us if there are any questions about this submittal.

Very truly yours,



J. A. Stall
Vice President
St. Lucie Plant

JAS/GRM

Attachment

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC
Senior Resident Inspector, USNRC, St. Lucie Plant



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CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: August 24, 1995
See Numerical Index for expiration
and any reaffirmation dates.

Case N-546
Alternative Requirements for Qualification of
VT-2 Examination Personnel
Section XI, Division 1

Inquiry: What alternative to the requirements of IWA-2300 may be used for qualification of VT-2 visual examination personnel?

Reply: It is the opinion of the Committee that VT-2 visual examination personnel need not be qualified nor certified to comparable levels of competence in

accordance with the referenced standard (i.e., ANSI N45.2.6, ASNT SNT-TC-1A, or ASNT CP-189) provided the examination personnel are qualified in accordance with the following requirements.

(a) At least 40 hrs plant walkdown experience, such as that gained by licensed and nonlicensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel.

(b) At least 4 hrs of training on Section XI requirements and plant specific procedures for VT-2 visual examination.

(c) Vision test requirements of IWA-2321, 1995 Edition.



10-1-71