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MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
VISSING,G.S.

SUBJECT: Requests approval for use of relief request number 42 to address volumetric examinations limitations (less than 90%) associated with eight Class 1 identified welds or areas of reactor pressure vessel.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

October 5, 1999

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Guy S. Vissing
Project Directorate I
Washington, D.C. 20555

Subject: Inservice Inspection Program ASME Section XI Required Examinations
Third 10-Year Interval
Relief Request No. 42
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Vissing:

The purpose of this letter is to seek approval for the use of Relief Request Number 42 to address volumetric examination limitations (less than 90%) associated with eight (8) Class 1 identified welds or areas of the Reactor Pressure Vessel (RPV).

This Relief is requested for seven (7) welds or areas pursuant to the provisions of 10CFR50.55a (g)(5)(iii). The required examination coverage for the identified items are impractical and would require redesign to allow examination or to be replaced to enable inspection. For one (1) weld an exemption is requested pursuant to the provisions of 10CFR50.55a (g)(6)(ii)(A)(5) for not meeting essentially 100% volumetric examination coverage. Justification concerning limitations are included in the attachment to this letter.

Since this relief request is for our 3rd 10-year interval ISI program, which ends December 31, 1999, approval is requested by December 31, 2000 in accordance with 10CFR50.55a (g)(5)(iv).

Very truly yours,

Robert C. Mecredy

Attachment

A047

xc: Mr. Guy S. Vissing (Mail Stop 8C2)
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

U.S. NRC Ginna Senior Resident Inspector

ATTACHMENT

Rochester Gas and Electric Corporation
Ginna Station
Docket No. 50/244
Third 10-Year Interval
Request for Relief No. 42
Reactor Pressure Vessel (RPV) Weld Examination Limitations

I. System/Component(s) for Which Relief/Exemption is Requested:

This Relief/Exemption Request pertains to eight (8) Reactor Pressure Vessel welds or Inner Radius Volumetric examinations. Of these eight welds or areas, seven are ASME Section XI required and one is required under 10 CFR 50.55a(g)(6)(ii)(A)(2). Volumetric examination of these items are limited as identified in Attachment Number 1.

II. ASME Section XI Code/10 CFR 50.55a Requirement:

ASME Section XI Code and 10 CFR 50.55a(g)(6)(ii)(A)(2) requires essentially 100% of the weld length or area to obtain coverage. ASME Section XI Code Case N-460 and regulation states that if the entire examination volume or area cannot be examined due to interference by another component or part geometry, a reduction in coverage is acceptable provided that the coverage (the lack of) is less than 10%.

III. Requirement from Which Relief/Exemption is Requested:

Relief/Exemption is requested from examining 100% of the weld length or areas for these eight (8) identified items. Examining 100% of the weld length or areas would be impractical due to original design interference. Attachment Number 1 identifies volumetric examination achievable coverage and associated limitations as well as identification as to the requirement (either ASME Section XI or 10 CFR 50.55a)

IV. Basis for Relief/Exemption:

Relief/Exemption is requested pursuant to the provisions of 10 CFR 50.55a(g)(5)(iii) and 10 CFR 50.55a(g)(6)(ii)(A)(5), the required examination coverage for the identified items are impractical and would require redesign to allow examination or to be replaced to enable inspection.

Request for Relief No. 42

The Reactor Pressure Vessel (RPV) was designed and constructed to ASME Section III, 1965 Edition. This code did not contain requirements to ensure that items be accessible for future examinations. The eight (8) items identified within Attachment Number 1 were installed utilizing this construction code which did not provide for accessibility for future ISI NDE.

The Class 1 Reactor Pressure Vessel is part of the ASME Section XI VT-2 Leakage Examination boundary. Class 1 Leakage Examinations are performed each refueling outage as required by the Code to insure pressure boundary integrity. In addition to the ASME Section XI leakage examinations, Operator walkdowns as specified by Plant Operating Procedures are also performed. The combination of operator walkdowns and the Class 1 leakage examination that is performed each refueling outage provide additional assurances in maintaining plant safety.

V. Alternate Examinations:

R.E. Ginna Nuclear Power Plant proposes that the volumetric examination coverage identified within Attachment Number 1 be acceptable in fulfilling required volumetric examination coverage.

VI. Justification for the Granting of Relief/Exemption:

The Reactor Pressure Vessel was designed and constructed to ASME Section III, 1965 Edition construction code. This code did not contain requirements to ensure that items be made accessible for future NDE examinations. Due to the original limited design accessibility, examination coverage can not be obtained to the extent required by the current ASME Code or Regulation.

ASME Section XI Class 1 periodic leakage examinations are performed as well as Operator walkdowns as specified by Plant Operating Procedures. These operator walkdowns and periodic system leakage examinations provide additional assurances in maintaining plant safety. The identified volumetric examination coverage for these items should be acceptable in fulfilling coverage requirements.

Previous examinations were performed on these items in conformance to the Code requirements in effect for RG&E at those times. It should also be noted that Relief Request Number 42 is similar to RG&E's Relief Request Number 19, which was previously approved by the NRC.

VII. Implementation Schedule:

These examinations have been performed, and code credit shall be taken for the Third 10-year Interval inspection, upon approval of Relief Request Number 42.

Attachment Number 1

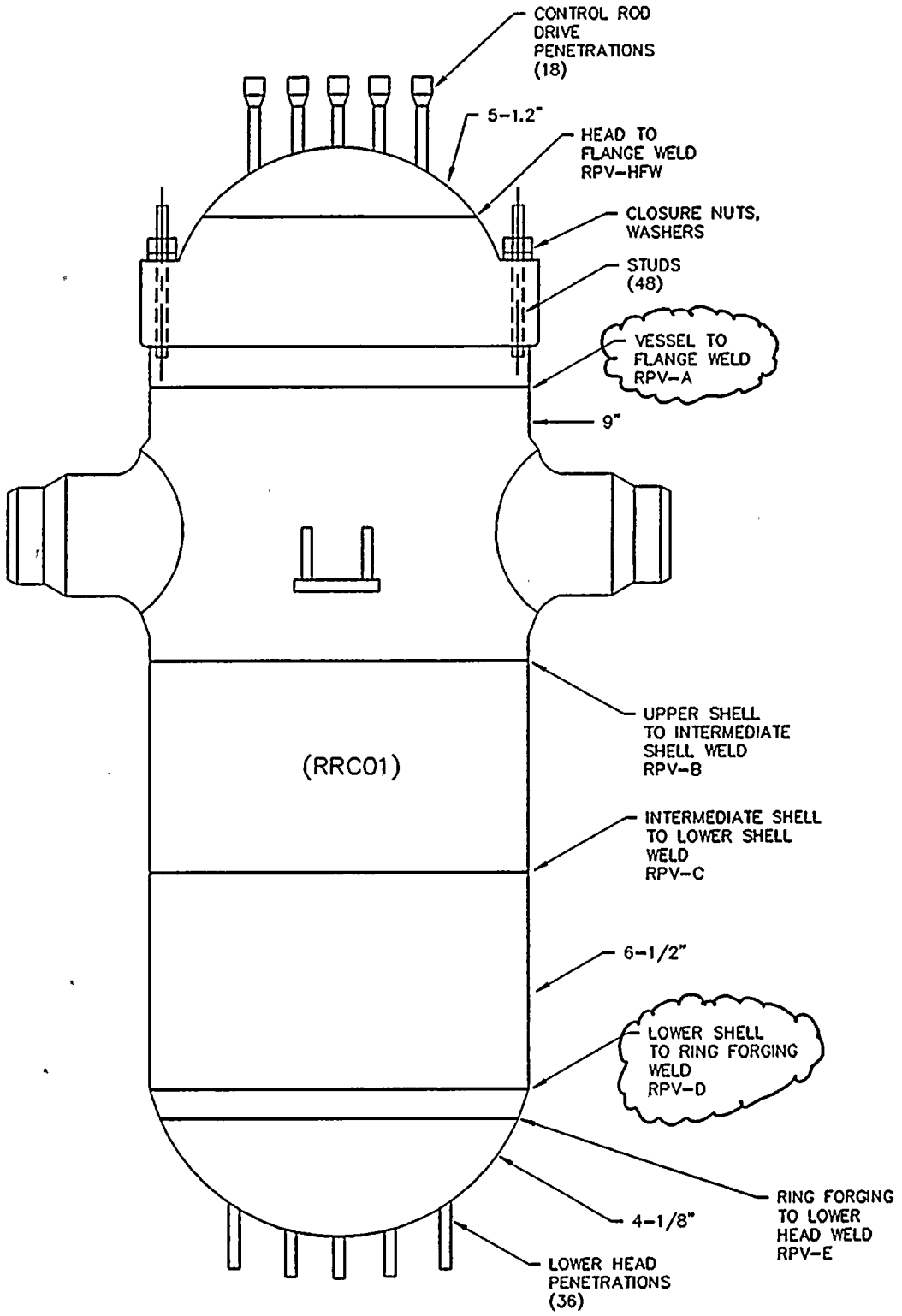
Rochester Gas & Electric Corporation, Relief Request Number 42

Reactor Pressure Vessel (RPV) Volumetric Examination Limitations

Category Number	Item Number	Summary Number	Weld ID	Description/Requirement	Obtained Coverage	Limitations
B-A	B1.30	000501 000502 000503	RPV-A	Vessel to Flange Circ. Weld Section XI Code Required	54%	Keyways & Irradiation Slots
B-A	B1.11	000300	RPV-D	Lower Shell to Ring Forging Circ. Weld. Required by 10CFR50.55a	81%	Guide Lugs & Incores
B-D	B3.90	001900	N1A	Nozzle Vessel WD 028D-30M. Section XI Code Required	55%[1] 70%[2]	Nozzle Boss
B-D	B3.90	002500	N1B	Nozzle Vessel WD 208D-30M. Section XI Code Required	55%[1] 70%[2]	Nozzle Boss
B-D	B3.100	002300	N2A-IRS	Nozzle Inside Radius Section. Section XI Code Required	90%	Inner Radius
B-D	B3.100	002900	N2B-IRS	Nozzle Inside Radius Section. Section XI Code Required	90%	Inner Radius
D-B	B3.90	003100	AC-1003	Nozzle Vessel WD 108D-30M. Section XI Code Required	55%[1] 72%[2]	Nozzle Boss
D-B	B3.90	003400	AC-1002	Nozzle Vessel WD 288D-30M. Section XI Code Required	55%[1] 72%[2]	Nozzle Boss

[1] Volumetric Weld Examination

[2] Volumetric Near Surface Examination



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		DATE: 11/1/95
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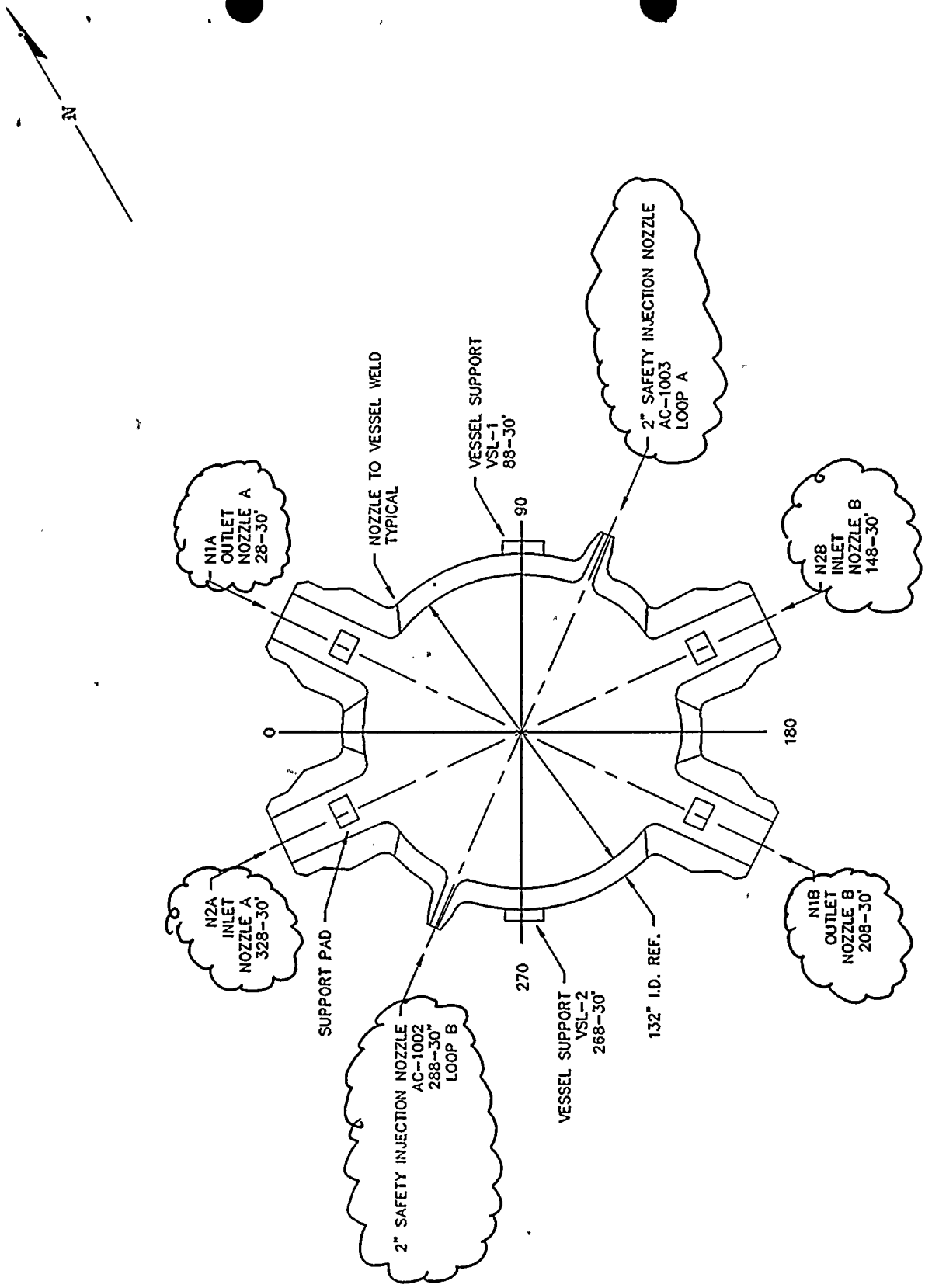

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