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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

December 7, 1979

Docket No. 50-348

Mr. Alan R. Barton
Senior Vice President
Alabama Power Company
Post Office Box 2641
Birmingham, Alabama 35291

Dear Mr. Barton:

We have completed our review of your inservice inspection program description for Farley Nuclear Plant, Unit No. 1 submitted as Attachments I, II and III to your letter dated July 8, 1977, supplemented on November 21, 1977, March 16 and March 30, 1978. Your proposed inservice inspection program includes a request for relief from certain ASME Code requirements. This inservice inspection program is applicable to the 40 month period which began on December 1, 1977.

Based on our review, we have concluded that your proposed inservice inspection program description conforms with the 1974 Edition of the ASME Code, Section XI and Addenda through summery 1975 to the extent practical for your facility within the limitations of design, geometry and the materials of construction of the components; and thus is acceptable. In addition, pursuant to 10 CFR 50.55a(g)(6)(i), we hereby grant relief from the ASME Code requirements that are identified in Enclosure 1.

We are granting this relief based on our review of the information you submitted to support your determinations that these ASME Code requirements would be impractical for your facility because of limited access, system or component design, and materials of construction of some components. We have determined that the granting of this relief is authorized by law and will not endanger life or property or the common defense and security and will otherwise be in the public interest. In making this determination we have given due consideration to the burden that could result if these requirements were imposed on the facility. We have determined that the granting of this relief does not involve a significant increase in the probability or consequences of accidents previously considered nor a decrease in safety margin; and thus, does not involve a significant hazards consideration. We have determined that relief from the Code requirements in many cases may be granted while maintaining adequate levels of safety by the use of alternative examination techniques. Certain other requests for relief from Code requirements are being granted conditionally as noted in Enclosure 1.

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Furthermore, we have determined that the granting of this relief from ASME Code requirements does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. We have concluded that the granting of this relief is insignificant from the standpoint of environmental impact and pursuant to 10 CFR 51.5(d)(4) that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with this action.

The relief from ASME Code requirements granted by this letter shall remain in effect until specifically revoked by the NRC or until the end of the 120-month period beginning December 1, 1977 for ASME Code Class 1, 2 and 3 components. The proposed inservice inspection program approved by this letter along with specific relief granted (Enclosure 1) satisfies Farley Nuclear Plant Technical Specification 4.0.5. By letter dated November 16, 1979 we have granted relief, on an interim basis, for your inservice testing program for pumps and valves.

We have determined that no license amendment fee is required for your initial request for relief. However, this determination is limited to the items which we reviewed as part of our request to implement the requirements of 10 CFR 50.55a. Any other unrelated changes or requests that you might choose to include at a later time would be subject to amendment fees in accordance with 10 CFR 170.22.

Copies of the Notice of Issuance relating to this action is also enclosed.

Sincerely,

A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

Enclosures:
1. List of ASME Code Requirements for Which Relief is Granted
2. Notice of Issuance

cc: w/enclosures
See next page

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ENCLOSURE NO. 1

LIST OF ASME CODE REQUIREMENTS
FOR WHICH RELIEF IS GRANTED
PURSUANT TO 10 CFR 50.55a(g)(6)(i)
FOR FARLEY NUCLEAR PLANT UNIT NO. 1

Based on the information submitted by Alabama Power Company (APC) and our review of the design, geometry, and materials of construction of the Farley Nuclear Plant Unit No. 1, certain requirements of the ASME Boiler and Pressure Vessel Code, Section XI, for Class 1, 2 and 3 components have been determined to be impractical.

Pursuant to 10 CFR 50.55a(g)(6)(i), we have granted relief from specific ASME Section XI Code requirements for the first 10 year inservice inspection interval. The conclusion with respect to granting relief for each request wholly or conditionally is stated below:

I. INSERVICE INSPECTION PROGRAM

A. Class 1 Components

1. Request relief from performing all of the code-required volumetric examinations of Items B1.1* and B1.2 reactor vessel lower head ring to peel segment weld, lower head peel segment meridional welds (6); and lower head peel segments to disc circumferential weld.

Code Requirement: Volumetric examination of 10% of the length of each longitudinal weld and 5% of the length of each circumferential weld.

Licensee Basis for Requesting Relief: Volumetric examination of these welds as required by IWB-2600 from inside the vessel is restricted by the locations of the adjacent incore instrumentation penetrations. Volumetric examination of those areas accessible between the penetrations and conduits will be performed from the outside surface provided the radiation levels in the general area do not exceed 1000 mr/hour.

Evaluation: The location of the incore instrumentation penetrations adjacent to the areas to be inspected precludes the performance of that inspection from within the vessel by remote equipment. Therefore, manual ultrasonic test inspection will be performed from the outside. We have concluded that the ultrasonic examinations in this manner will provide adequate assurance of structural integrity of these joints. We have determined that the exposure rate provided by the applicant is meaningless without some knowledge of the time necessary to perform the inspection. Current considerations for this particular inspection would require its performance within acceptable personnel exposure limits.

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*The item number reference is from Table IWB 2600.

2. Request relief from performing all of the code-required volumetric examinations of Item B1.3, reactor vessel closure head peel segment to disc circumferential weld.

   Code Requirement: Volumetric examination of 5% of the length of the circumferential weld.

   Licensee Basis for Requesting Relief: The closure head peel segment to disc weld is completely enclosed within the pattern of CRDM penetrations inside the shroud and is not accessible for volumetric examination as required by IWB-2600. In lieu of this, the area will be visually examined for evidence of leakage during performance of system hydrostatic tests.

   Evaluation: The location of the control rod drive penetrations precludes performance of UT examination of the subject weld. We conclude that the initial integrity of this weld has been determined by the in-process preservice examination and that the surveillance by visual examination for leakage during hydrostatic testing is satisfactory.

3. Request relief from performing all of the code-required volumetric examination of the Item B2.2, pressurizer nozzle to vessel welds (6).

   Code Requirement: Volumetric examination of 100% of the volume to be inspected as shown in Figure IWB 2500D.

   Licensee Basis for Requesting Relief: The geometric configuration of the weld surface prevents ultrasonic examinations being performed to the extent required by IWB-2600. Angle beam examinations will be performed from the vessel head and on the top of the weld as allowed by I-5121.

   Evaluation: The pressurizer design provides a weld surface which prevents the required inspection. The licensee has stated that angle beam examinations from the vessel head and the top of the weld will be performed. We conclude that the complete examination from the head side and on top of the weld provides an adequate level of assurance of structural integrity provided it is supplemented by surface examination on those areas not scanned by UT.

4. Request relief for performing all of the code-required volumetric and surface examination of the Item B3.3 steam generator nozzle to safe end welds (3 S/G x 2 SE = 6).

   Code Requirement: Volumetric and surface examination of 100% for the welds.

   Licensee Basis for Requesting Relief: The design of the steam generator incorporates a weld deposited clad overlay on the safe

end nozzle to base metal interface that prevents examination of 100% of the safe end adjacent base metal as required by IWB-2600. Ultrasonic examinations will be performed from the pipe side and the weld surface as allowed by T-532 of Section V. Examinations are severely limited from the nozzle side by the rough, as cast surface and the clad overlay. Surface examinations will be performed on 100% of the weld and pipe surfaces.

Evaluation: The design of the steam generator nozzle safe end prevents the required inspection. The licensee has stated and we have agreed that the ultrasonic examination from the pipe side and weld surface and the 100% surface examinations of the weld and pipe surfaces will provide adequate insurance of structural integrity of these joints.

5. Request relief from performing a portion of the volumetric and surface examination of Item B4.1 safe end to pipe welds.

   Code Requirement: Volumetric and surface examination of 100% of the welds.

   Licensee Basis for Requesting Relief: The arrangements and details of the piping systems and components are such that some examinations as required by IWB-2600 are limited due to geometric configuration or accessibility. Generally, these limitations exist at pipe to fitting welds, where examination can only be fully performed from the pipe side, the fitting geometry limiting or even precluding examination from the opposite side. The welds will be ultrasonically examined by angle beam to the extent allowed by geometric configuration. In all cases, 100% of the weld material will be examined. Also surface examinations will be performed to supplement the limited volumetric examinations. Specific welds having such restrictions are provided in Table 1 of the March 30, 1978 submittal.

   Evaluation. The design of the piping system and components is such that some examinations are limited. However, we have concluded that the ultrasonic examination from the pipe side of the weld and the surface examination will provide adequate insurance of structural integrity of these joints.

6. Request relief from performing all of the code-required volumetric inspection of Item B4.5 circumferential and longitudinal pipe welds.

   Code Requirement: Volumetric inspection of 25% of the circumferential joints including the adjoining 1 ft. sections of longitudinal joints and 25% of the pipe branch connection joints.

Licensee Basis for Requesting Relief:

a. Volumetric examination of these welds as required by IWB-2600 from inside the vessel is restricted by the locations of the adjacent incore instrumentation penetrations. Volumetric examination of those areas accessible between the penetrations and conduits will be performed from the outside surface provided the radiation levels in the general area do not exceed 1000 mr/hour.

b. The arrangements and details of the piping systems and components are such that some examinations as required by IWB-2600 are limited due to geometric configuration or accessibility. Generally, these limitations exist at pipe to fitting welds, where examination can only be fully performed from the pipe side, the fitting geometry limiting or even precluding examination from the opposite side. The welds will be ultrasonically examined by angle beam to the extent allowed by geometric configuration. In all cases, 100% of the weld material will be examined. Also surface examinations will be performed to supplement the limited volumetric examinations. Specific welds having such restrictions are provided in Table 1 of the March 30, 1978 submittal.

Evaluation: The design of the piping system and components is such that some examinations are limited. However, we have made the following conclusions:

a. We have determined that the exposure rate provided by the applicant is meaningless without some knowledge of the time necessary to perform the inspection. Current consideration would require its performance within acceptable personnel exposure limits.

b. We have concluded that the ultrasonic examination from the pipe side and the weld surface examinations will provide adequate insurance of structural integrity of these joints.

7. Request relief from performing all of the code-required volumetric inspection of Item B4.6 branch pipe connection welds exceeding 6 inch diameter.

Code Requirement: Volumetric inspection of 25% of the pipe branch connection joints.

Licensee Basis for Requesting Relief: The geometric configuration of the weld surface prevents ultrasonic examinations from being performed to the extent required by IWB-2600. Examinations will be performed to the extent practical from the pipe and nozzle surfaces adjacent to the weld. Surface examination of the weld

will be performed to supplement the volumetric examination. Specific welds having such restrictions are provided in Table 2 of the March 30, 1978 submittal.

Evaluation: The design of the weld is such that the required examination cannot be performed fully. However, we have determined that the extent of volumetric inspection supplemented by the surface inspection will provide adequate assurance of structural integrity of these joints.

8. Request relief from performing all of the code-required volumetric examination of Item B4.9 integrally welded supports.

   Code Requirement: Volumetric examination of 25% of the integrally welded supports.

   Licensee Basis for Requesting Relief: The piping system integrally welded supports are attached to the pipe by fillet welds. The configurations of such welds is such that examinations cannot be performed to the extent required by IWB-2600 and only the base material of the pipe wall can be examined by ultrasonic techniques. Surface examination will be performed on the integrally welded attachments to supplement the limited volumetric examination.

   Evaluation: The design of the integrally welded supports is such that the required volumetric examination cannot be performed to the extent required. Therefore, we have determined that the extent of the volumetric examination supplemented by the surface examination will provide adequate assurance of structural integrity.

9. Request relief from performing volumetric examination of Item B5.1 pressure retaining bolts.

   Code Requirement: Volumetric examination of 100% of the bolting either in place or when disassembled.

   Licensee Basis for Requesting Relief: The reactor coolant pump seal housing bolts are of the socket head type and the configuration is such that ultrasonic examinations as required by IWB-2600 cannot be performed when the bolting is in place. Examinations will be performed when the seal housing is disassembled for maintenance. If no disassembly for maintenance is required within the Section XI inspection interval then disassembly will be performed for inspection.

   Evaluation: We have determined that this is not a request for relief in the strict sense of the term but merely a statement of an alternative method permitted by BG-1 of Table IWB-2500.

10. Request relief from performing volumetric examination of Item B5.2 pressure retaining bolting.

Code Requirement: Volumetric examination of 100% of the bolting either in place or when disassembled.

Licensee Basis for Requesting Relief: This examination as required by IWB-2600 will only be performed when the pump is disassembled for maintenance purposes or at the end of the 10 year interval when disassembly is undertaken for the performance of pump casing examinations.

Evaluation: We have determined that this is not a request for relief in the strict sense of the term but merely a statement of an alternative method permitted by BG-1 of Table IWB-2500.

B. Class II Components

1. Request relief from performing all of the code-required volumetric examination of Item C1.1 regenerative heat exchanger head to shell welds (6) and shell to tubesheet welds (6).

   Code Requirement: Volumetric examination of the circumferential butt welds.

   Licensee Basis for Requesting Relief: The regenerative heat exchanger shell is fabricated from centrifugally cast austenitic steel material which limits ultrasonic examination as required by IWC-2600 to the half node technique. The geometric configuration of the weld surface and the location of adjacent nozzles provide limitations to the extent of examination coverage. Surface examinations will be performed to supplement the volumetric examination.

   Evaluation: The design of the regenerative heat exchanger is such that the required inspection cannot be performed. However, we have determined that the limited volumetric inspection augmented by the surface inspection will provide adequate assurance of integrity.

2. Request relief from performing all of the code-required volumetric examination of Item C1.2 residual heat exchangers (2) (tube side) nozzle to vessel welds.

   Code Requirement: Volumetric examination of nozzle to vessel welds.

   Licensee Basis for Requesting Relief: The nozzle to vessel welds of the residual heat exchangers are covered by a reinforcement ring and are not accessible for examination as required by IWC-2600. The geometric configuration is such that alternative NDE methods cannot be substituted.

Evaluation: The design of the residual heat exchangers is such that it is not possible to perform the required volumetric examination. However, we have determined that the other (head to shell and shell to tubesheet) weld examination should provide some indication of the integrity of the nozzle to vessel welds.

3. Request relief from performing volumetric examination of the following Item C1.1 circumferential butt welds:

   a. Seal water return filter-cover weldment to shell weld.
   b. Seal water return filter head to shell weld.
   c. Letdown reheat heat exchanger (tube side) head to shell weld.
   d. Letdown reheat heat exchanger (tube side) shell to flange weld.
   e. Seal water heat exchanger (tube side) head to shell weld.
   f. Seal water heat exchanger shell to flange weld.
   g. Reactor coolant filter-cover head to shell weld.

   Code Requirement: Volumetric examination of circumferential butt welds.

   Licensee Basis for Requesting Relief: The thickness of the materials utilized for the construction of these components (0.165 to 0.185 inches) is such that meaningful results could not be expected with ultrasonic examination as required by IWC-2600. Surface and visual examination of these welds will be performed as an alternative method.

   Evaluation: The design of these components is such that it is not possible to perform the required inspections. However, the alternative inspection will provide adequate assurance of the integrity of these welds provided UT is performed to the extent pract cable.

4. Request relief from all of the code-required volumetric inspection of Item C2.1 piping systems circumferential butt welds.

   Code Requirement: Volumetric inspection of circumferential butt welds.

   Licensee Basis for Requesting Relief: The arrangement and details of the Class 2 piping system and components were designed and fabricated before the examination requirements of Section XI of the Code were formalized and some examinations as required by IWC-2600 are limited or not practical due to geometric configuration or accessibility.

   Generally these limitations exist at all fitting to fitting welds such as elbow to tee, elbow to valve, reducer to valve, etc., where geometry and sometimes surface conditions preclude ultrasonic coupling or access for the required scan length. The limitations

exist to a lesser degree at pipe to fitting welds, where examination can only be fully performed from the pipe side, the fitting geometry limiting or even precluding examination from the opposite side. The welds will be ultrasonically examined by angle beam to the extent allowed by geometric configuration; however, 100% of the weld material will be examined. Also surface examinations will be performed to supplement the limited volumetric examinations.

In instances of branch pipe to pipe welds, ultrasonic examinations cannot be performed on the surface of the weld. Surface examination will be performed on 100% of the weld and adjacent base material.

Specific circumferential and branch connection welds having such restrictions are provided in Tables 1 and 2 of the March 30, 1978 submittal.

In instances where the location of pipe supports or hangers restrict the access available for the examination of pipe welds as required by IWC-2600, examinations will be performed to the extent practical unless removal of the support is permissible without unduly stressing the system.

Evaluation: The design of the piping systems, components and supports or hangers is such that it is impossible or impractical to perform the required inspections. However, we have concluded that the alternative examinations will provide adequate assurance of integrity of the welds.

5. Request relief from all of the code-required volumetric inspection of branch pipe to pipe welds in Item C2.3 piping systems.

   Code Requirement: Volumetric examination of branch pipe to pipe weld joints.

   Licensee Basis for Requesting Relief: The arrangement and details of the Class 2 piping system and components were designed and fabricated before the examination requirements of Section XI of the Code were formalized and some examinations as required by IWC-2600 are limited or not practical due to geometric configuration or accessibility. Generally these limitations exist at all fitting to fitting welds such as elbow to tee, elbow to valve, reducer to valve, etc., where geometry and sometimes surface conditions preclude ultrasonic coupling or access for the required scan length. The limitations exist to a lesser degree at pipe to fitting welds, where examination can only be fully performed from the pipe side, the fitting geometry limiting or even precluding examination from the opposite side. The welds will be ultrasonically examined by angle beam to the extent allowed by geometric configuration; however, 100% of the weld material will be examined. Also surface

examinations will be performed to supplement the limited volumetric examinations.

Evaluation: The design of the piping system is such that the required inspection is impossible or impractical. However, we have concluded that the alternative examinations will provide adequate assurance of integrity of the welds.

6. Request relief from volumetric inspection of centrifugal charging pumps (3) casing welds at code-required inspection period.

   Code Requirement: Volumetric examination of pump casing welds.

   Licensee Basis for Requesting Relief: The pressure retaining welds in the charging pump casings are not normally accessible for examination as required by IWC-2600. Examination of these welds will be performed as required by IWC-2600 when the pump is disassembled for maintenance. If no disassembly for maintenance is required within the Section XI inspection interval, then disassembly will be performed for inspection.

   Evaluation: The design of the pump casing is such that the required inspection requires disassembly of the pump. This is impractical for reasons of inspection only. We have determined that this request to perform the inspection within the Section XI inspection interval (10 years) rather than the inspection period (40 months) will provide adequate assurance of the integrity of the pump casing welds.

C. Class III Components

1. Request relief from code-required hydrostatic pressure during visual examination of river water pumps (5) and service water pumps (5).

   Code Requirement: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

   Licensee Basis for Requesting Relief: The design of these pumps is such that inspection of these vertical centrifugal pumps as required by IWD-2410 (b) and (c) is impractical except at the pump discharge nozzle. Visual inspection of the discharge nozzle will be done while the pump is operating. Should the pump be pulled for maintenance the casing will be visually inspected at that time.

   Evaluation: The design of these pumps is such that the required inspections are impractical. We have determined that the alternative inspection will provide satisfactory assurance of the integrity of the pumps.

2. Request relief from code-required hydrostatic pressure during visual examination of the following items:

   a. River water strainers (2).
   b. Service water strainers (2).
   c. Service water charging pump bearing and gear oil coolers (3).
   d. Component cooling water charging pump seal coolers (3).
   e. Component cooling water RHR pump seal coolers (3).

   Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

   Licensee Basis for Requesting Relief: The licensee has stated that equipment system pressure testing requirements of IWD-2410 (b) will not be performed on lines 2 inches and smaller unless:

   a. They are connected to larger lines which will be pressure tested.
   b. Isolation valves are not provided so that these smaller lines may be isolated in case of leakage.

   All accessible piping 2 inches and smaller will be visually inspected while under normal operating pressure.

   Evaluation: We have concluded that the alternative inspection will provide adequate assurance of integrity of these components.

3. Request relief from code-required hydrostatic pressure during visual examination of river water piping.

   Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

   Licensee Basis for Requesting Relief: The licensee has stated that the system pressure testing requirements of IWD-2410 (b) will not be performed on lines 2 inches and smaller unless:

   a. They are connected to larger lines which will be pressure tested.
   b. Isolation valves are not provided so that these smaller lines may be isolated in case of leakage.

   All accessible piping 2 inches and smaller will be visually inspected while under normal operating pressure.

   System pressure testing as required by IWD-2410 (b) is impractical since this system operates continuously during all modes of plant operation. This functional operation serves to demonstrate the structural and leaktight integrity of the system. Visual inspection

will be performed while the system is under normal operating pressure to verify leaktightness.

The design of the system does not include provisions for testing buried piping as required by IWD-2600 (b). Buried piping will be inspected by conducting a visual observation of the ground (at ground elevation) for wet spots while the system is under operating pressure. This is in accordance with FSAR paragraphs 3.1.41 and 9.2.2.1.4.

Evaluation: We have evaluated the alternative inspection(s) proposed and have determined that adequate assurance of integrity will be provided.

4. Request relief from code-required hydrostatic pressure during visual examination of auxiliary steam piping and spent fuel pool cooling piping.

   Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

   Licensee Basis for Requesting Relief: The licensee has stated that the testing requirements of IWD-2410 (b) will not be performed on lines 2 inches and smaller unless:

   a. They are connected to larger lines which will be pressure tested.
   b. Isolation valves are not provided so that these smaller lines may be isolated in case of leakage.

   All accessible piping 2 inches and smaller will be visually inspected while under normal operating pressure.

   There is no practical means of isolating this system so that a system pressure test may be performed in accordance with IWD-2410 (b). Visual inspection will be performed while the system is under normal operating pressure to verify leaktightness.

   Evaluation: We have determined that the alternative inspection proposed will provide adequate assurance of piping integrity.

5. Request relief from code-required hydrostatic pressure during visual inspection of the following items:

   a. Service water strainers (2).

   b. Diesel generator heat exchangers (HX).

   c. Component cooling water pumps (3).

d. Chemical and volume control BIT recirculation pumps (2).

e. Reactor make-up water-storage pumps (2).
Reactor make-up water-storage piping.

f. Component cooling water CCW heat exchangers (3) (shell side).

g. CVCS letdown HX (shell side).

h. CVCS excess letdown HX (shell side).

i. CVCS seal water HX (shell side).

j. RHR HX (2) (shell side).

k. Spent fuel pool HX (2) (shell side).

l. R. C. drain tank HX (shell side).

m. Reactor make-up water-storage pumps.

n. Reactor make-up water-storage piping.

o. Spent fuel pool cooling pumps (2).

Code Requirements: Visual examinations for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

Licensee Basis for Requesting Relief: The applicant has stated that the system pressure testing as required by IWD-2410 (b) is impractical since these systems operate continuously during all modes of plant operation. This functional operation serves to demonstrate the structural and leaktight integrity of the system. Visual inspection will be performed while the system is under normal operating pressure to verify leaktightness.

Evaluation: We have determined that the alternative inspection proposed for these components will provide adequate assurance of their integrity.

6. Request relief from code-required hydrostatic pressure during visual examination of the tube side of the service water CCW heat exchanger and the spent fuel pool heat exchangers (2).

Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

Licensee Basis for Requesting Relief: The licensee has stated that the inspection requirements of IWD-2410 (b) and (c) are impractical for the tubes of these heat exchangers. Tube side inspection will be performed by isolating the heat exchanger, removing the waterbox covers, and pressurizing the shell side with water. Tube leakage is indicated if there is any flow from the tubes while in this configuration. This type inspection will be performed at least once per inspection interval.

Evaluation: We have determined that the alternative inspection proposed will provide adequate assurance of the integrity of these components.

7. Request relief from code-required hydrostatic pressure during visual inspection of the following items:

   a. Service water auxiliary feedwater pump room coolers (3).
   b. Service water battery chargers room coolers (3) (tubes only).
   c. Service water charging pump room cooler (3) (tubes only).
   d. Service water CCW pump room coolers (2) (tubes only).
   e. Service water CTMT spray pump room cooler (2) (tubes only).
   f. Service water 600V load center coolers (2) (tubes only).
   g. Service water MCC room coolers (2) (tubes only).
   h. Service water RHR LHSI pump room cooler (2) (tubes only).
   i. Service water control room A/C condensers (2) (tubes only).

   Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

   Licensee Basis for Requesting Relief: The licensee has stated that the inspection requirements of IWD-2410 (b) and (c) are impractical for the tubes of these room coolers. The normal operation of room coolers demonstrates their structural and leaktight integrity. The coolers will be inspected by observing the cooler basin drain for any abnormal flow (other than normal condensation) while the cooler is operating.

   Evaluation: We have determined that the alternative inspection proposed will provide adequate assurance of the integrity of the tubes of these coolers and condensers.

8. Request relief from code-required hydrostatic pressure during visual examination of service water containment coolers (4) (tubes only).

   Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

Licensee Basis for Requesting Relief: The licensee has stated that the inspection requirements of IWD-2410 (b) and (c) are impractical for these air coolers. The normal operation of containment air coolers demonstrates their structural and leaktight integrity. Visual inspection will be performed while the system is under normal operating pressure.

Evaluation: We have determined that the alternative inspection proposed will provide adequate assurance of the integrity of the tubes of these coolers.

9. Request relief from code-required hydrostatic pressure during visual examination of service water piping.

Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

Licensee Basis for Requesting Relief: The licensee has stated that the system pressure testing requirements of IWD-2410 (b) will not be performed on lines 2 inches and smaller unless:

a. They are connected to larger lines which will be pressure tested.
b. Isolation valves are not provided so that these smaller lines may be isolated in case of leakage.

All accessible piping 2 inches and smaller will be visually inspected while under normal operating pressure.

Equipment with primary connections 2 inches and under will be visually examined in accordance with the following:

System pressure testing as required by IWD-2410 (b) is impractical since this system operates continuously during all modes of plant operation. This functional operation serves to demonstrate the structural and leaktight integrity of the system. Visual inspection will be performed while the system is under normal operating pressure to verify leaktightness.

The design of the system does not include provisions for testing buried piping as required by IWD-2600 (b). Buried piping will be inspected by conducting a visual observation of the ground (at ground elevation) for wet spots while the system is under operating pressure. This is in accordance with FSAR paragraphs 3.1.41 and 9.2.1.4.

Evaluation: We have determined that the alternative inspections proposed will provide adequate assurance of the integrity of this piping.

10. Request relief from code-required hydrostatic pressure during visual examination of component cooling piping and chemical and volume control piping.

    Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

    Licensee Basis for Requesting Relief: The licensee has stated that the system pressure testing requirements of IWD-2410 (b) will not be performed on lines 2 inches and smaller unless:

    a. They are connected to larger lines which will be pressure tested.
    b. Isolation valves are not provided so that these smaller lines may be isolated in case of leakage.

    All accessible piping 2 inches and smaller will be visually inspected while under normal operating pressure.

    System pressure testing as required by IWD-2410 (b) is impractical since this system operates continuously during all modes of plant operation. This functional operation serves to demonstrate the structural and leaktight integrity of the system. Visual inspection will be performed while the system is under normal operating pressure to verify leaktightness.

    Evaluation: We have determined that the alternate inspections proposed for this piping will provide adequate assurance of its integrity.

11. Request relief from code-required hydrostatic pressure during visual examination of the containment spray additive system.

    Code Requirements: Visual examination for leakage, structural distress or corrosion when the system is undergoing either a system inservice test, component functional test or a system pressure test.

    Licensee Basis for Requesting Relief: The licensee has stated that there is no practical means of isolating this system so that a system pressure test may be performed in accordance with IWD-2410 (b). Visual inspection will be performed while the system is under normal operating pressure to verify leaktightness.

    Evaluation: We have determined that the alternate inspection proposed will provide adequate assurance of the integrity of this system.