Mailing Address
Alabama Power Company
600 North 18th Street
Post Office Box 2641
Birmingham, Alabama 35291
Telephone 205 783-6081

F. L. Clayton, Jr.
Senior Vice President
Flintridge Building

Alabama Power
the southern electric system

Docket No. 50-364

January 10, 1983

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

50-364

Attention: Mr. S. A. Varga

Joseph M. Farley Nuclear Plant - Unit 2
Inservice Inspection Program for ASME
Code Class 1, 2 and 3 Components

Gentlemen:

In accordance with the requirements of 10CFR50.55a(g)(6)(i), Alabama Power Company hereby requests that relief be granted from the requirements of the 1974 Edition through the Summer 1975 Addenda of the ASME Code, Section XI, Table IWB-2600 Item Numbers B1.13, B1.14, B2.9 and B3.8. A complete description of the affected components, existing examination requirements, bases of request for relief and proposed alternative examinations are contained in Attachment I.

This request is designated as Class I in accordance with 10CFR170.22 requirements since the original technical review was done for Unit 1 in compliance with our April 17, 1981 letter and as supplemented by our January 10, 1983 letter. Enclosed is a check for $400.00 to cover the total amount of additional fees required. This amount is remitted since this is a duplicate unit review with $4,000.00 submitted with the Unit 1 supplement request dated January 10, 1983.

Yours truly,

F. L. Clayton Jr.

STB:bs
Enclosures
cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. J. P. O'Reilly
Mr. E. A. Reeves
Mr. W. H. Bradford

A001 w/check $400.00

8301180091 830110
PDR ADOCK 05000364
P PDR

ATTACHMENT I

2.13.13 RELIEF REQUEST

COMPONENT: CODE CLASS: 1

Reactor Vesel Closure Head Cladding, Reactor Vessel Cladding, Pressurizer Cladding and Steam Generator Cladding (Item Numbers B1.13, B1.14, B2.9, and B3.8, Examination Categories B-I-1 and B-I-2).

EXAMINATION REQUIREMENT:

Visual and surface or volumetric examination of the reactor vessel closure head cladding shall include at least six patches (each 36 sq. in.) evenly distributed in the closure head. Visual examination of the reactor vessel cladding shall include at least six patches (each 36 sq. in.) evenly distributed in accessible sections of the vessel shell. The examinations performed during each inspection interval shall cover 100% of the patch areas.

Visual examination of the pressurizer and steam generator vessel cladding shall include at least one patch (36 sq. in.) near each manway in the primary side of the vessel. The examinations performed during each inspection interval shall cover 100% of the patch areas. The examination of the patch areas in the pressurizer and steam generator may be performed at or near the end of the inspection interval.

BASIS FOR RELIEF:

Reactor vessel closure head cladding patches and the pressurizer and steam generator cladding examinations, which must be performed by manual inspections under the head or inside the vessels, are impractical because of the high radiation levels in the areas required to be examined. The reactor vessel cladding visual examination is impractical to perform because of the critical outage time required to remove the access plugs or fuel and core barrel that enable the use of cameras to assist in the examination.

ALTERNATIVE EXAMINATION:

The reactor vessel closure head welds are volumetrically examined per Table IWB-2600, Item B1.2 Category B-B and Item B1.3 Category B-C. The closure head cladding adjacent to the welds is also examined volumetrically since Section XI requires that the base material for one wall thickness on each side of the weld also be examined. Although the clad areas adjacent to the welds are not "evenly distributed" as required in Category B-I-1, the total area of examinations as required by Categories B-B and B-C far exceed those of Category B-I-1.

Therefore, the weld examinations per Items B1.2 and B1.3 will be used to satisfy the requirements of Item B1.13.

The reactor vessel longitudinal and circumferential shell welds are volumetrically examined per Table IWB-2600, Item B1.1 Category B-A and Item B1.2 Category B-B. The pressurizer longitudinal and circumferential welds are volumetrically examined per Table IWB-2600, Item B2.1 Category B-B.

The tube sheet-to-head weld on the steam generators are volumetrically examined per Table IWB-2600, Item B3.1 Category B-B. These weld examinations include the cladding on the weld and the adjacent base metal for a distance of one wall thickness on each side of the weld.

CONCLUSION:

Volumetric examinations which are required for the longitudinal and circumferential welds in vessels and in the reactor vessel closure head provide sufficient evidence of component structural integrity. Additional support for not requiring the present inspections is that later NRC approved editions of Section XI no longer require cladding inspections but allow for volumetric examinations. Based on this guidance, no additional cladding examinations will be performed for categories B-I-1 and B-I-2.