

PHILADELPHIA ELECTRIC COMPANY
 NUCLEAR GROUP HEADQUARTERS
 955-65 CHESTERBROOK BLVD.
 WAYNE, PA 19087-5691
 (215) 640-6000

NUCLEAR ENGINEERING & SERVICES DEPARTMENT

March 19, 1992

Docket Nos. 50-277
 50-278
 License Nos. DPR-44
 DPR-56

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

SUBJECT: Peach Bottom Atomic Power Station, Units 2 and 3
 Clarification of Second Interval ISI Program
 Relief Request

REFERENCES: (1) Letter from G. A. Hunger (PECo) to USNRC,
 dated November 15, 1990
 (2) Telecon between PECo and USNRC Staff,
 dated January 10, 1992

Dear Sir:

In the Reference 1 letter, Philadelphia Electric Company supplied a revised edition of the "Inservice Inspection (ISI) Program Second Ten Year Interval" for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. As part of this transmittal, seventeen (17) Relief Requests were submitted for information or review and approval. In the Reference 2 telecon, additional clarification regarding four (4) of the seventeen Relief Requests was requested. In response to this telecon, attached are updated copies (Revision 1) of the four Relief Requests.

The attached document contains the clarifications requested during the telecon, and additional updates resulting from review of the latest examination data. The original Relief Requests (Revision 0) contained in the Reference 1 letter were primarily developed from examination data obtained from the first ISI Inspection Interval. Since that time, subsequent ISI examinations and physical plant changes occurred which have yielded updated examination results. These updates can also be attributed to use of improved examination equipment, advances in NDE technology, changes in selection of components subject to examination, and clarification of examination results.

Because of these changes, the remaining thirteen (13) Relief Requests submitted in the Reference 1 letter have been

AC47

reviewed. Necessary changes have been identified in an additional three (3) of thirteen requests (RR-4, RR-6, and RR-14). Revised copies of Relief Requests RR-4 and RR-14 are attached. Relief Request RR-6 is still under review and will be submitted by April 17, 1992. In accordance with 10CFR50.55a(g)(5), we will continue to develop or revise the ISI Relief Requests as situations dictate.

Summary of Changes to PBAPS 2 and 3 ISI Relief Requests

Relief Request RR-05

Additional Information Requested

Does the percent complete information pertain to surface or volumetric examinations completed? Additionally, identify the ASME Code Item Number associated with each component examination listed.

Response

The percent complete information for volumetric and surface examinations has been added to Table RR-05-1 and RR-05-2. The ASME Code Item Numbers have also been added to the Tables.

The following additional clarifications are being provided to this relief request:

Table RR-05-1, Unit 2:

- 1) Examination coverage has been increased for two components (1-B-7LD & 1-D-12).
- 2) Four components have been deleted since subsequent examinations have achieved Code required examination coverage (1-B-15, 1-B-15LU, 1-C-15LU, 10-IA-2).
- 3) Four components have been added to the Relief Request (1-D-7LD, 10-IB-15LU, 10-IA-15LU, 10-0-35LD).

Table RR-05-2, Unit 3:

- 1) Examination coverage has been decreased for one component (1-A-7LD).
- 2) Two components have been deleted since subsequent examinations have achieved Code

required examination coverage (10-IA-14A,
10-IB-14B).

Relief Request RR-07

Additional Information Requested

Does the percent complete information pertain to surface or volumetric examinations completed? Additionally, identify the ASME Code Item Number associated with each component examination listed.

Response

This Relief Request has been deleted and is therefore withdrawn. 10-2HS6-13 is an Examination Category C-F Item No. C5.11 component. This component requires a surface examination only, which has been completed in accordance with Code requirements.

Relief Request RR-13

Additional Information Requested

- a) Why are the examination coverages small relative to the Code required examination volume?
- b) Why is the 45 degree parallel scan impractical?
- c) Why is a better examination coverage achieved with the 60 degree transverse scan versus the 45 degree transverse scan?

Response

a) Overall examination coverages are low due to the barrel type nozzle configuration which restricts the examination scanning to one side of the weld. The one sided examination is further limited by interferences of the scanning equipment with nearby components.

b) The 45 degree parallel scan is impractical because skewing of the 45 degree transducer (to examine the subject weld metal at the nozzle inside surface) during the parallel scan would cause the sound beam to be directed nearly perpendicular (transverse) to the weld centerline. This would render the examination ineffective as a parallel scan.

c) Since examination is only possible from one side of the weld, the 60 degree transverse beam will scan the largest

portion of the Code required volume, as depicted in the drawing on Attachment 1.

As an additional update, this Relief Request has been expanded to define specific examination coverage for each nozzle previously examined. Originally, generic coverages were provided for each group of nozzles. All examination data pertains to volumetric examinations, and is the maximum effective examination coverage which can be achieved given the nozzle configuration. Attachment 1 provides a diagram of the nozzle to vessel weld configuration, along with an indication of the maximum extent of manual coverage which can be achieved versus Code requirements. As indicated, the 60% transverse scan produces the maximum coverage of the Code required volume.

Relief Request RR-15

Additional Information Requested

Provide a diagram which will support the request for relief from performing complete examinations.

Response

Attachment 2 contains a sketch of this pump support configuration.

As an additional update to this relief request, the extent of examinations completed has been reduced from 50% to 20%. This reduction in coverage is the result of a plant modification which added reinforcing plates to the original pump support structure. These reinforcing plates cause three of the four reinforcing rib attachment welds to be inaccessible for surface examination.

The Following Additional Updates are Being Provided

Relief Request RR-4

The wording in the "Alternate Provisions" section has been revised to more closely reflect the Plant Technical Specification wording regarding allowable Reactor Vessel pressures and temperatures.

Relief Request RR-14

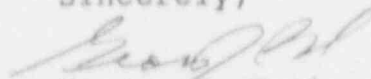
Code Cases N-460 and N-461 have been deleted from this Relief Request since they have been adopted for use per Regulatory Guide 1.147.

These revised Relief Requests will be formally incorporated into the ISI Program Specification following the completion of their review by regulatory authorities.

This letter was originally due to the Nuclear Regulatory Commission on March 13, 1992. In a telephone conversation with the Nuclear Regulatory Commission Project Manager (R. Clark) on March 11, 1992, a one week extension to March 20, 1992 was granted.

If you have any questions, please contact us.

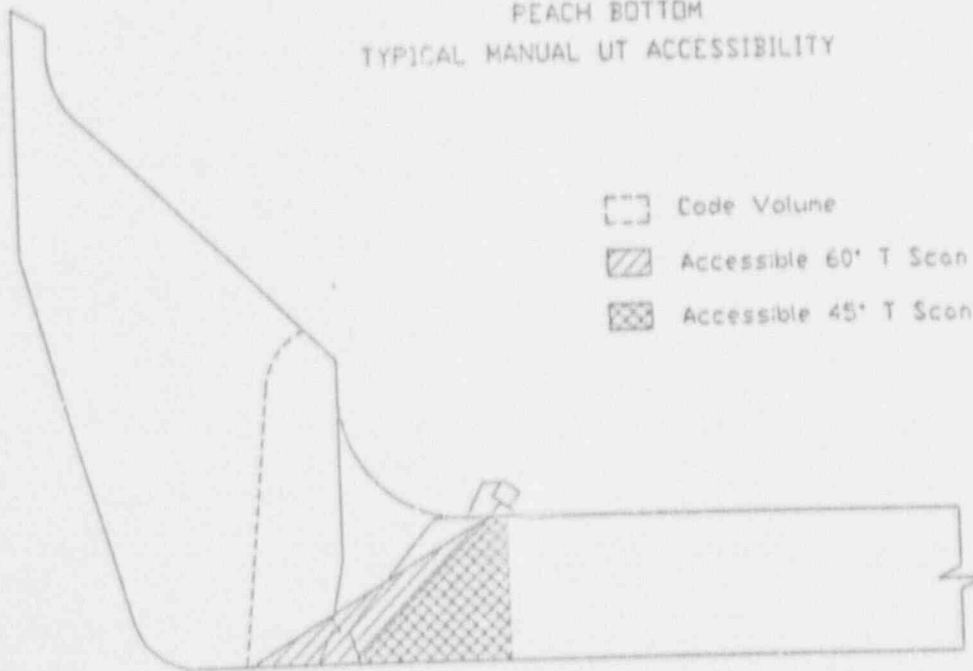
Sincerely,



George J. Beck
Manager
Licensing Section

cc: J. J. Lyash, USNRC Senior Resident Inspector
T. Martin, Administrator, Region I, USNRC

PEACH BOTTOM
TYPICAL MANUAL UT ACCESSIBILITY



ACCESSIBLE CODE VOLUME
EXAMINATION CATEGORY B-D

RELIEF REQUEST NO RR-04

Revision 1

I. IDENTIFICATION OF COMPONENTS

All ISI Class 1 pressure retaining components, Code examination Category B-P, Item Numbers B15.11, B15.51, B15.61 and B15.71.

II. CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

ASME Section XI 1980 Edition Winter 1981 Addenda, Code Category B-P requires that a system hydrostatic test of the pressure retaining components within the system boundary be performed once per inservice inspection interval, in accordance with the applicable system pressure test requirements of IWB-5000.

Relief is requested from meeting the hydrostatic test pressure as required by Table IWB-5220-1, "Test Pressure", (i.e., 1082 psig at 212°F).

III. BASIS FOR RELIEF

PBAPS Plant Technical Specifications require primary containment integrity be maintained whenever the reactor water temperature is above 212 degrees Fahrenheit and fuel is in the vessel. Primary containment integrity requires the drywell to be intact and all automatic primary containment isolation valves to be operable or deactivated in the isolated position. However, to facilitate visual inspection of the reactor pressure vessel head flange and head spray nozzle areas, the drywell head must be removed. Therefore, a complete Code hydrostatic test cannot be performed at reactor water temperatures above 212 degrees Fahrenheit.

Per Table IWB-5220-1, a test temperature of 212 degrees Fahrenheit corresponds to a test pressure of 1082 psig. PBAPS would like to conduct the hydrostatic test with all relief valves in place and perform the hydrostatic test at a pressure 30 psig below

RELIEF REQUEST NO. RR-04 (CONTD.)
Revision 1

the lowest relief valve setting. (This setting is determined at the time of the hydrostatic test based on the most current relief valve bench test data.) Gagging and/or removal of the four (4) lowest set relief valves is costly in both critical path time and personnel exposure and is impractical for a relatively small increase in pressure to meet Code requirements. (1082 psig vs. 1075 ± 11 psig)

IV. ALTERNATE PROVISIONS

Code Category B-P hydrostatic testing will be performed at a test pressure approximately 30 psig below the lowest verifiable relief valve set point, nominally 1075 ± 11 psig (assuming bench test data of 1105 psig for the lowest relief valve setting), and at the applicable "Safe Operating Region" test temperature determined from the plant Technical Specifications, Figure 3.6.1.

RELIEF REQUEST NO. RR-05

Revision 1

I. IDENTIFICATION OF COMPONENTS

ISI Class 1 pressure retaining welds in piping including circumferential and longitudinal welds, branch pipe connection welds and socket welds, Code Examination Category B-J, Item Numbers B9.10 through B9.40 inclusive.

II. CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

ASME Section XI 1980 Edition Winter 1981 Addenda, Code Category B-J requires a volumetric and/or surface examination of essentially 100% of the weld length of all selected circumferential, and longitudinal welds, branch pipe connection welds and socket welds during the second inservice inspection interval.

Relief is requested from performance of a complete examination of the Code required area/volume of the weld due to limited accessibility as a result of plant design, component configuration and/or metallurgical or environmental restraints.

III. BASIS FOR RELIEF

The affected welds are individually detailed in Table RR-05-1 for PBAPS Unit #2 and in Table RR-05-2 for PBAPS Unit #3.

The examination coverage indicated is the maximum practical without undue hardship to PBAPS. Increased examination coverage is not possible without costly plant redesign/modification and/or excessive personnel exposure.

Partial examinations and examination of other similar selected welds in the system provide reasonable assurance of weld structural integrity. In addition, the affected

RELIEF REQUEST NO. RR-05 (CONTD.)
Revision 1

welds are subject to Code Examination Category B-P requirements and are visually examined during system pressure testing throughout the interval.

IV. ALTERNATE PROVISIONS

For circumferential welds where examination is completely impractical (examination 0% complete), an additional Code Category B-J weld will be selected for examination.

RELIEF REQUEST NO. RR-05 (CONTD.)
Revision 1

TABLE RR-05-1
UNIT #2

<u>EXAMINATION AREA ID EXAM CAT/ITEM</u>	<u>SYSTEM/ CONFIGURATION</u>	<u>LIMITING CONDITION</u>	<u>EXAMINATION % COMPLETE</u>
1-B-7 B-J, B9.11	Main Steam/ Tee-Pipe	Access limited due to pipe support components within the examination area	86% volumetric
1-B-7LD B-J, B9.12	Main Steam/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	35% each surface & volumetric
1-B-8 B-J, B9.11	Main Steam/ Pipe-Cap	One-sided examination due to material and/or design configuration with physical plant obstructions on remaining side	70% volumetric
1-B-8LU B-J, B9.12	Main Steam/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	0% surface & volumetric
1-D-9 B-J, B9.11	Main Steam/ Pipe-Elbow	Access limited due to pipe support components within the examination area	50% volumetric
1 D-9LU B-J, B9.12	Main Steam/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	0% surface & volumetric

RELIEF REQUEST NO. RR-05 (CONTD.)
Revision 1

TABLE RR-05-1 (CONTD.)
UNIT #2

<u>EXAMINATION AREA ID. EXAM CAT/ITEM</u>	<u>SYSTEM/ CONFIGURATION</u>	<u>LIMITING CONDITION</u>	<u>EXAMINATION % COMPLETE</u>
1-D-12 B-J, B9.11	Main Steam/ Pipe-Valve	One-sided examination due to material and/or design configuration with physical plant obstructions on remaining side	40% volumetric
1-D-7LD B-J, B9.12	Main steam/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	45% each surface & volumetric
10-1B-15LU B-J, B9.12	Residual Heat Removal/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	10% each surface & volumetric
10-1A-15LU B-J, B9.12	Residual Heat Removal/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	10% each surface & volumetric
10-O-35LD B-J, B9.12	Residual Heat Removal/ Longitudinal Seam Weld	Access limited due to penetration	76% each surface & volumetric

RELIEF REQUEST NO. RR-05 (CONTD.)
Revision 1

TABLE RR-05-2
UNIT #3

<u>EXAMINATION AREA I.D. EXAM CAT/ITEM</u>	<u>SYSTEM/ CONFIGURATION</u>	<u>LIMITING CONDITION</u>	<u>EXAMINATION % COMPLETE</u>
1-A-7LD B-J, B9.12	Main Steam/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	50% each surface & volumetric
1-B-7 B-J, B9.11	Main Steam/ Tee-Pipe	One-sided examination due to material and/or design configuration with physical plant obstructions on remaining side	85% volumetric
1-B-7LD B-J, B9.12	Main Steam/ Longitudinal Seam Weld	Access limited due to pipe support components within the examination area	25% each surface & volumetric

RELIEF REQUEST NO. RR-07

Revision 1

Deleted

RELIEF REQUEST NO. RR-13

Revision 1

I. IDENTIFICATION OF COMPONENTS

ISI Class 1 full penetration nozzle to vessel welds in the reactor pressure vessel, Code Examination Category B-D, Item Number B3.90.

II. CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

ASME Section XI 1980 Edition Winter 1981 Addenda, Code Category B-D requires volumetric examination of the nozzle to vessel welds (full penetration) of all nozzles in the reactor pressure vessel during the second inservice inspection interval.

Relief is requested from performance of a complete examination of the Code required volume due to access restrictions as a consequence of plant design and/or component configuration.

III. BASIS FOR RELIEF

PBAPS has thirty (30) Code Category B-D nozzle to vessel attachment welds on each unit, many of which cannot be completely examined due to vessel nozzle forging configuration. The barrel type nozzle forging configuration precludes complete ultrasonic examination since scanning of the weld is only practical from one side of the weld. Also, in support of ALARA, many of the nozzle to vessel welds are to be examined utilizing a remote automated nozzle scanner; thereby, slightly exaggerating the limitations, versus a manual examination, due to scanner design. In addition to the nozzle forging configuration, physical plant design restrictions, such as adjacent components, further limit the available scan path.

RELIEF REQUEST NO. RR-13 (CONTD.)
Revision 1

Tables RR-13-1 (Unit #2) and RR-13-2 (Unit #3) list the nozzle to vessel welds and detail the extent of examinations completed (for nozzles already examined), or provide the expected examination coverage (for nozzles not yet examined).

All examinations are performed to the maximum extent practical. In the case of examinations performed utilizing remote automatic equipment, only a very slight increase in examination coverage ($\approx 5\%$) can be realized with supplemental manual exams; however, this small increase comes with a significant increase in personnel exposure, and, therefore, manual examination was not performed.

Limited volumetric examination coupled with the visual examination requirements of Code Examination Category B-P during system pressure testing provide reasonable assessment of weld structural integrity.

IV. ALTERNATE PROVISIONS

No alternate provisions are practical for these examinations.

RELIEF REQUEST NO. RR-13 (CONTD.)
 Revision 1

TABLE RR-13-1
 Effect of Nozzle Design Configuration
 on Component Inspectability¹
Examination Category B-D, Item No B3.90

Nozzle identification/ Description	Unit #2		
	Type Scan ²	% Code Complete ³	% Inner 1/4T Code Complete ⁴
N1A Recirculation Outlet	45T	17.2 (A)	41.5 (A)
	60T	28.3 (A)	66.9 (A)
	60P	23.6 (A)	57.2 (A)
N2A Recirculation Inlet	45T	29.1 (A)	51.5 (A)
	60T	37.4 (A)	71.1 (A)
	60P	23.0 (A)	43.9 (A)
N2B Recirculation Inlet	45T	28.7 (A)	50.6 (A)
	60T	36.9 (A)	70.1 (A)
	60P	22.7 (A)	43.2 (A)
N2C Recirculation Inlet	45T	28.7 (A)	50.8 (A)
	60T	36.9 (A)	70.1 (A)
	60P	24.0 (A)	45.8 (A)
N2D Recirculation Inlet	45T	29.5 (A)	52.2 (A)
	60T	37.9 (A)	72.1 (A)
	60P	23.4 (A)	44.5 (A)
N2E Recirculation Inlet	45T	32.0 (A)	56.7 (A)
	60T	41.1 (A)	78.1 (A)
	60P	25.7 (A)	48.9 (A)
N2F Recirculation Inlet	45T	28.2 (A)	50.0 (A)
	60T	36.3 (A)	69.0 (A)
	60P	22.4 (A)	42.6 (A)
N2H Recirculation Inlet	45T	33.6 (A)	59.6 (A)
	60T	43.2 (A)	82.2 (A)
	60P	26.7 (A)	50.8 (A)

RELIEF REQUEST NO. RR-13 (CONTD.)
Revision 1

TABLE RR-13-1 (CONTD.)
Unit #2

Nozzle Identification/Description	Type Scan ²	% Code Complete ¹	% Inner 1/4T Code Complete ¹
N3A Main Steam	45T	9.6 (A)	33.4 (A)
	60T	23.7 (A)	66.9 (A)
	60P	11.3 (A)	40.1 (A)
N3D Main Steam	45T	8.0 (A)	31.2 (A)
	60T	24.2 (A)	62.5 (A)
	60P	9.4 (A)	36.7 (A)
N4 Feedwater (Typ. of 6 nozzles)	45T	28.8 (M) ⁵	66.5 (M) ⁵
	60T	45.5 (M) ⁵	100.0 (M) ⁵
	60P	27.0 (M) ⁵	62.6 (M) ⁵
N5A Core Spray	45T	23.6 (A)	46.7 (A)
	60T	34.2 (A)	65.1 (A)
	60P	19.7 (A)	39.4 (A)
N5B Core Spray	45T	23.6 (A)	46.7 (A)
	60T	34.2 (A)	65.1 (A)
	60P	19.7 (A)	39.4 (A)
N8A Jet Pump Instrumentation	45T	92.4 (M)	100.0 (M)
	60T	93.0 (M)	100.0 (M)
	45P	80.1 (M)	83.7 (M)
	60P	80.1 (M)	83.7 (M)
N9 Control Rod Drive Nozzle (Typ. of 1 nozzle)	45T	31.1 (M) ⁵	71.6 (M) ⁵
	60T	46.6 (M) ⁵	100.0 (M) ⁵
	45P	17.4 (M) ⁵	37.3 (M) ⁵
	60P	27.5 (M) ⁵	62.5 (M) ⁵

Footnotes:

- 1) Component inspectability based on actual examination results or evaluation of nozzle design configuration for each given type/size nozzle.
- 2) Unless indicated, a 45 degree parallel scan is not practical due to weld configuration.

RELIEF REQUEST NO. RR-13 (CONTD.)

Revision 1

- 3) % Code complete is that percent of the ASME Code required examination volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 4) % Inner 1/4T Code complete is that percent of the critical inner 1/4T wall volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 5) N4 Feedwater and N9 Control Rod Drive nozzle % complete is optimum based on estimated accessible Code volume utilizing manual ultrasonic techniques; actual automated ultrasonic examination data, (not available at this time) is expected to yield slightly reduced coverage to due equipment limitations.

RELIEF REQUEST NO. RR-13 (CONTD.)

Revision 1

TABLE RR-13-2

Effect of Nozzle Design Configuration
on Component Inspectability¹

Examination Category B-D, Item No. B3.90

Unit #3

Nozzle Identification/ Description	Type Scan ²	% Code Complete ³	% Inner 1/4T Code Complete ⁴
N1A Recirculation Outlet	45T	6.2 (A)	27.0 (A)
	60T	18.9 (A)	63.5 (A)
	60P	12.4 (A)	47.6 (A)
N2A Recirculation Inlet	45T	16.1 (A)	40.4 (A)
	60T	30.5 (A)	70.2 (A)
	60P	13.9 (A)	34.3 (A)
N2B Recirculation Inlet	45T	14.9 (A)	37.4 (A)
	60T	28.3 (A)	65.1 (A)
	60P	12.8 (A)	31.8 (A)
N2C Recirculation Inlet	45T	17.1 (A)	42.8 (A)
	60T	32.3 (A)	74.3 (A)
	60P	14.7 (A)	36.4 (A)
N2D Recirculation Inlet	45T	16.4 (A)	41.0 (A)
	60T	31.0 (A)	71.2 (A)
	60P	13.9 (A)	34.3 (A)
N2E Recirculation Inlet	45T	16.6 (A)	41.6 (A)
	60T	31.4 (A)	72.3 (A)
	60P	14.3 (A)	35.4 (A)
N2F Recirculation Inlet	45T	16.1 (A)	40.4 (A)
	60T	31.4 (A)	72.3 (A)
	60P	14.3 (A)	35.4 (A)
N2H Recirculation Inlet	45T	16.8 (A)	42.2 (A)
	60T	31.9 (A)	73.3 (A)
	60P	14.3 (A)	35.4 (A)

RELIEF REQUEST NO. RR-13 (CONTD.)
Revision 1

TABLE RR-13-2 (CONTD.)
Unit #3

Nozzle Identification/ Description	Type Scan ²	% Code Complete ¹	% Inner 1/4T Code Complete ¹
N3A Main Steam	45T	9.8 (A)	38.1 (A)
	60T	24.3 (A)	76.4 (A)
	60P	11.4 (A)	45.0 (A)
N3D Main Steam	45T	9.4 (A)	36.6 (A)
	60T	23.4 (A)	73.4 (A)
	60P	11.0 (A)	43.4 (A)
N4 Feedwater (Typ. of 6 nozzles)	45T	24.6 (M) ⁵	63.3 (M) ⁵
	60T	41.7 (M) ⁵	99.1 (M) ⁵
	60P	23.0 (M) ⁵	59.2 (M) ⁵
N5A Core Spray	45T	19.9 (A)	44.0 (A)
	60T	31.3 (A)	65.4 (A)
	60P	15.1 (A)	35.6 (A)
N5B Core Spray	45T	20.2 (A)	44.7 (A)
	60T	31.8 (A)	66.4 (A)
	60P	15.3 (A)	36.2 (A)
N8A Jet Pump Instrumentation	45T	91.8 (M)	100.0 (M)
	60T	92.5 (M)	100.0 (M)
	45P	77.3 (M)	80.7 (M)
	60P	77.3 (M)	80.7 (M)
N9 Control Rod Drive Nozzle (Typ. of 1 nozzle)	45T	29.0 (M) ⁵	70.6 (M) ⁵
	60T	45.0 (M) ⁵	100.0 (M) ⁵
	45P	14.9 (M) ⁵	34.8 (M) ⁵
	60P	25.4 (M) ⁵	61.0 (M) ⁵

Footnotes:

- 1) Component inspectability based on actual examination results or evaluation of nozzle design configuration for each given type/size nozzle.
- 2) Unless indicated, a 45 degree parallel scan is not practical due to weld configuration.

RELIEF REQUEST NO. RR-13 (CONTD.)
Revision 1

- 3) % Code complete is that percent of the ASME Code required examination volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 4) % Inner 1/4T Code complete is that percent of the critical inner 1/4T wall volume which can effectively be examined using automated (A) or manual (M) ultrasonic examination techniques.
- 5) N4 Feedwater and N9 Control Rod Drive nozzle % complete is optimum based on estimated accessible Code volume utilizing manual ultrasonic techniques; actual automated ultrasonic examination data, (not available at this time) is expected to yield slightly reduced coverage to due equipment limitations.

RELIEF REQUEST NO. RR-14

Revision 1

I. SCOPE

This relief request is applicable to those ASME Code Cases adopted for use in this ISI Program which have not been specifically endorsed for use by the USNRC in Regulatory Guide 1.147 (reference 1.1.24).

II. DISCUSSION

Code Cases are periodically published by the ASME for the purpose of either clarifying the intent of Code rules or for providing rules and regulations for circumstances which are not currently covered by existing Code rules but need to be addressed in a timely manner. Use of these non-mandatory Code Cases for inservice inspection is subject to USNRC acceptance of the Code Case(s). Regulatory Guide 1.147 lists those Code Cases that have been reviewed by the NRC and are generally acceptable for implementation in an ISI Program. Other Code Cases may be used provided specific authorization is requested pursuant to 10CFR50.55a.

The purpose of this relief request is to request authorization of the adoption of specific Code Case(s) for implementation in the PBAPS 2&3 ISI Program.

III. CODE CASES REQUIRING AUTHORIZATION

The following Code Case(s) require specific authorization for use in the PBAPS 2 & 3 ISI Program:

A. N-479 Boiling Water Reactor (BWR) Main Steam Hydrostatic Test

The Class 2 portion of the Main Steam system is incapable of being isolated from the Class 1 portion for purposes of performing a hydrostatic test. Use of

RELIEF REQUEST NO. RR-14 (CONTD.)
Revision 1

this Code Case allows testing to the alternative rules of IWB-5222 (Class 1), which is most practical in this situation.

IV. ALTERNATE PROVISIONS

The alternative rules of the Code Case(s) in III above shall be implemented in the PBAPS 2 & 3 ISI Program for the second inservice inspection interval.

V. BASIS FOR RELIEF

All of the Code Case(s) discussed in III above represent technically acceptable alternative rules to ASME Section XI Code rules. The fact that these Code Cases have not been endorsed in the Regulatory Guide in no way detracts from their technical adequacy since the major reason for their omission is the timing of their publication with respect to the most recent revision of the Regulatory Guide. That is, the subject code Cases are relatively recent and it is expected that these Code Cases will be accepted in a subsequent revision of the Regulatory Guide.

Adoption of these alternative rules provides an acceptable level of quality and safety and does not compromise the adequacy of the PBAPS 2 & 3 ISI Program in meeting the intent of ASME Section XI.

RELIEF REQUEST NO. RR-15

Revision 1

I. IDENTIFICATION OF COMPONENTS

ISI Class 2 integral attachments for vessels, piping pumps and valves, Code Examination Category C-C, Item Numbers C3.10 through 3.40.

II. CODE REQUIREMENTS FROM WHICH RELIEF IS REQUESTED

ASME Section XI 1980 Edition Winter 1981 Addenda, Code Category C-C, requires a surface examination of essentially 100% of the required area of each welded attachment selected for examination during the second inservice inspection interval.

Relief is requested from performance of a complete examination of the Code required area due to limited accessibility resulting from plant design, component configuration, and/or environmental restraints.

III. BASIS FOR RELIEF

Each of the four RHR pumps have a base plate integrally welded to the pump casing, along with four radially oriented reinforcing ribs which are also welded to the pump casing. The base plate to pump casing weld is totally inaccessible, since it is under the base plate. Additionally, the reinforcing rib to pump casing weld on three of the four ribs are also inaccessible due to pump support reinforcing plates which cover these ribs.

Examination of these welds are performed to the maximum extent practical. Increased examination coverage is not possible without costly plant redesign/modification.

The extent of examination coverage is identified in Table RR-15-01.

RELIEF REQUEST NO. RR-15 (CONT'D.)
Revision 1

IV. ALTERNATE PROVISIONS

No alternate provisions are practical for the components listed in Table RR-15-01.

RELIEF REQUEST NO. RR-15 (CONTD.)
Revision 1

TABLE RR-15-01
UNIT 2&3
Examination Category C-C, Item No C130

<u>EXAMINATION AREA IDENTIFICATION</u>	<u>UNIT</u>	<u>EXAMINATION % COMPLETE</u>	<u>LIMITING CONDITION</u>
PUMP-B-IWS (RHR PUMP LUGS)	2	20%	Complete exam is not practical due to support design; access restrictions exist on all of four (4) pumps.
PUMP-A-IWS (RHR PUMP LUGS)	3	20%	Complete exam is not practical due to support design; access restrictions exist on all of four (4) pumps.