

December 6, 1995

Mr. E. Thomas Boulette, Ph.D
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, MA 02360

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE PILGRIM NUCLEAR POWER
STATION THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN
AND ASSOCIATED REQUESTS FOR RELIEF (TAC NO. M93398)

Dear Mr. Boulette:

Enclosed is a request for additional information generated as a result of NRC
staff review, with assistance from our contractor, Idaho National Engineering
Laboratory (INEL), regarding your subject submittal.

The staff requests that the response be provided within 60 days to meet the
staff's inservice inspection program plan review schedule. In addition, to
expedite the review process, please send a copy of your response to INEL,
attention: Michael T. Anderson, INEL Research Center, 2151 North Boulevard,
P.O. Box 1625, Idaho Falls, Idaho 83415-2209.

The requirement affects nine or fewer respondents and, therefore, is not
subject to the Office of Management and Budget review under P. L. 96-511.

Sincerely,

Original signed by:

Ronald B. Eaton, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

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PDR ADOCK 05000293
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Docket No. 50-293

Enclosure: Request for Additional
Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in black ink, appearing to read "Ronald B. Eaton".

Ronald B. Eaton, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosure: Request for Additional
Information

cc w/encl: See next page

E. Thomas Boulette

Pilgrim Nuclear Power Station

cc:

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REQUEST FOR ADDITIONAL INFORMATION

THIRD 10-YEAR INTERVAL INSERVICE

INSPECTION PROGRAM PLAN

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the successive 120-month inspection interval shall comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of a successive 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein. The licensee, Boston Edison Company (BECO), has prepared the Pilgrim Nuclear Power Station (PNPS), Third 10-Year Interval Inservice Inspection (ISI) Program Plan to meet the requirements of the 1989 Edition of Section XI of the ASME Code.

As required by 10 CFR 50.55a(g)(5), if BECO determines that certain Code examination requirements are impractical and requests relief, the licensee shall submit information to the NRC to support that determination.

The staff has reviewed the available information in the PNPS, Third 10-Year Interval ISI Program Plan, Revision 0, submitted September 1, 1995, and the requests for relief from the ASME Code Section XI requirements that BECO has determined to be impractical.

2. Additional Information Required

Based on the above review, the staff has concluded that additional information and/or clarification is required to complete the review of the ISI Program Plan.

- A. Provide a list of the ultrasonic calibration standards that will be used during the third 10-year interval ISI at PNPS. The list should include the material specifications and sizes, as well as a reference to the piping and/or components to which the calibration standards apply.

Enclosure

- B. Paragraph 1.4, states that augmented inservice inspection requirements are documented in the controlled Quality Assurance Department, Quality Control Instruction No. 20.48, "Control of Augmented Examinations." Please provide a copy of this document. This information will enable the staff to review the extent of augmented examinations being performed for the third 10-year interval.
- C. 10 CFR 50.55a(b)(2)(iv) requires that appropriate ASME Code Class 2 piping welds in the Residual Heat Removal (RHR), Emergency Core Cooling (ECC), and Containment Heat Removal (CHR) systems shall be examined. Portions of these systems should not be completely omitted from inservice volumetric examination based on Section XI selection criteria (piping wall thickness) specified in Table IWC-2500-1. The staff has previously determined that a 7.5% augmented volumetric sample of thin-wall welds constitutes an acceptable resolution at similar plants.

Define the systems or portions of systems that provide RHR, ECC, and CHR functions at PNPS, and provide a list of the subject welds that have been excluded from selection based on wall thickness as allowed by Table IWC-2500-1. From this list, identify those welds that will be scheduled for examination to provide an appropriate sampling of welds otherwise excluded from examination because of wall thickness.

- D. Effective September 8, 1992, regulations were issued regarding augmented examination of reactor vessels. As a result of these regulations, all licensees must augment their reactor vessel examinations by implementing once, as part of the ISI interval in effect on September 8, 1992, the examination requirements for reactor vessel shell welds specified in Item B1.10 of Examination Category B-A of the 1989 Code. In addition, all previously granted relief for Item B1.10, Examination Category B-A, for the interval in effect on September 8, 1992 is revoked by this regulation. For licensee's with fewer than 40 months remaining in the interval on the effective date, deferral of the augmented examination is permissible with the conditions stated in the regulations.

Provide the staff with the status of the augmented reactor pressure vessel examinations required by regulations issued September 8, 1992, and provide a technical discussion describing how the regulation was/will be implemented for these welds at PNPS. Include in the discussion a description of the approach and any specialized techniques or equipment that was/will be used to complete the required augmented examination.

- E. Request for Relief PRR-9 requests relief from the Code-required coverage of reactor pressure vessel nozzle-to-shell and nozzle inner radius sections. The licensee has stated that examinations will be performed to the extent possible. From initial review of this request for relief, it has been determined that the information provided is insufficient to conclude that Code-required coverage is impractical. Provide the

estimated percentage of coverage obtainable for each of the subject nozzles. In addition, discuss the impracticality and or burden associated with increasing coverage.

- F. For Code Class 1 integral attachment welds to piping, pumps, and valves, the Code does not require examinations for the third and fourth interval when implementing Inspection Program B. Examination of integral attachments in Code Class 2 and 3 systems is required in the third interval. Since Code Class 1 systems are considered the highest safety class, it is considered technically prudent to continue examinations of Class 1 integral attachments for the life of the plant. Therefore, it is recommended that an augmented sample of Class 1 integral attachments be scheduled for examination in the third interval (10% is an acceptable sample). Provide the number of integral attachments by Code class that will be examined during the third 10-year interval.
- G. For Request for Relief PRR-22, it appears that relief is being requested from future submittals of relief requests. Cases are cited, where because of access, alternative examination areas will be selected. In keeping with the successive examination requirements of the Code, the licensee should have historical information on access and coverages obtainable. In addition, the requirement for submittal of relief requests is in 10 CFR 50.55a(g)(5)(iii) that states that, "If the licensee has determined that conformance with certain Code requirements is impractical for its facility, the licensee shall notify the Commission and submit, as specified in 50.4 information to support the determinations." Is it the intent of the licensee to receive relief from future relief request submittals?
- H. Verify that there are no relief requests in addition to those submitted. If additional relief requests are required, the licensee should submit them for staff review.

The schedule for timely completion of this review requires that the licensee provide, by the requested date, the above requested information and/or clarification with regard to the PNPS, Third 10-Year Interval ISI Program Plan. It is noted that in the ISI Plan submittal letter dated September 1, 1995, the licensee committed to provide drawings related to the ISI Plan and a table of scheduled examinations.