



MISSISSIPPI POWER & LIGHT COMPANY

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P. O. BOX 1640, JACKSON, MISSISSIPPI 39205

September 20, 1984

NUCLEAR LICENSING & SAFETY DEPARTMENT

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

Attention: Mr. Harold R. Denton, Director

Dear Mr. Denton:

SUBJECT: Grand Gulf Nuclear Station
Unit 1
Docket No. 50-416
License No. NPF-13
File: 0260/L-860.0/L-952.0/M-189.0
Preservice and Inservice Inspection
to ASME Section XI (Request Nos.
I-00012 and 00015)
AECM-84/0470

This letter transmits requests for relief from ASME Section XI Code requirements for the inservice inspection (No. I-00012) and also for the Preservice Inspection (No. 00015) of the pressure retaining piping weld for the Grand Gulf Nuclear Station (GGNS) Unit 1 in accordance with 10CFR50.55a(g)(5)(IV).

The attachment delineates the information with regard to such relief requests for your review. The details of the attached relief requests and reasons for seeking relief are similar to those for other welds for which Relief Request No. 00007/I-00010 were previously submitted. It is to be noted that Relief Request No. 00007 was approved in SSER 2, Appendix D and that the approval of Relief Request No. I-00010 for the Inservice Inspection program is pending.

Please provide your expeditious review to support the completion of the Preservice Inspection program and the commencement of the Inservice Inspection program.

If you have any questions or require further information, please contact this office.

Yours truly,

L. F. Dale
Director

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PDR ADDCK 05000416
Q PDR

GS/JGC:cb
Attachment

cc: (See Next Page)

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MISSISSIPPI POWER & LIGHT COMPANY

cc: Mr. J. B. Richard (w/a)
Mr. R. B. McGehee (w/o)
Mr. N. S. Reynolds (w/o)
Mr. G. B. Taylor (w/o)

Mr. Richard C. DeYoung, Director (w/a)
Office of Inspection & Enforcement
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. J. P. O'Reilly, Regional Administrator (w/a)
U.S. Nuclear Regulatory Commission
Region II
101 Marietta St., N.W., Suite 2900
Atlanta, Georgia 30323

GRAND GULF NUCLEAR STATION
UNIT 1

REQUEST FOR RELIEF NO. I-00012

INSERVICE INSPECTION
OF PRESSURE RETAINING WELDS

- I. Component: Inaccessible portion of Class I pressure retaining piping weld located on reactor core isolation cooling (RCIC, E51). (See Table 1 for details.)
- II. Code: This portion of the pressure retaining piping weld was designed and fabricated to the ASME Section III, Class 1 requirements. Applicable inservice inspections are to be performed in accordance with the ASME Section XI, 1977 Edition through and including Summer 1979 Addenda.
- III. Code requirements: Class 1 pressure retaining piping welds are required to be volumetrically and surface examined, essentially 100% of the weld, once every ten-year interval in accordance with ASME Section XI, Table IWB-2500-1, Category B-J.
- IV. Information to support the determination that the code requirements are impractical: A portion of the listed weld that was preservice examined has a physical obstruction due to design. Due to the limited accessibility, it is impractical to volumetrically examine 100% of the weld listed on Table 1.
- V. Specific relief requested: Permission is requested to exempt from volumetric examination the inaccessible portion of the Class 1 weld listed on Table 1.
- VI. Reasons why relief should be granted: Request for an exemption should be granted for the following reasons:
1. The entire listed weld was examined by radiography and passed in accordance with ASME Section III, Class 1 requirements.
 2. The entire listed weld was surface examined (liquid penetrant) and passed in accordance with ASME Section III and/or Section XI, Class I requirements.
 3. The listed weld was subjected to a hydrostatic test and VT-2 examination in accordance with ASME Section XI, Class 1 requirements and no leaks were found.
 4. The listed piping weld will be subject to a system leakage test after each refueling outage for Class 1 in accordance with ASME Section XI requirements.

GRAND GULF NUCLEAR STATION
UNIT 1

REQUEST FOR RELIEF NO. I-00012
(Continued)
INSERVICE INSPECTION
OF PRESSURE RETAINING WELDS

- VI. Reasons why relief should be granted:
5. The listed piping weld will be subject to a system hydrostatic test each inspection interval in accordance with ASME Section XI, Class 1 requirements.
 6. The entire listed weld, including that portion inaccessible for volumetric examination, will be surface examined each inspection interval, in accordance with ASME Section XI.
 7. Accessible portion of the listed weld will be volumetrically examined each inspection interval in accordance with ASME Section XI. Should indications be found, an engineering evaluation will be made to determine if the inaccessible portion of the listed weld has been affected.
 8. Leak detection is provided, by way of leakage detection system with continuous monitoring for the RCIC system.
 9. The failure of this weld would have no adverse effect on plant safety as there is isolation capability as part of the plant design.
- VII. Alternative testing:
- The accessible portion of the weld identified in Table 1 will be inspected twice by volumetric examination during the 10 year interval.

GRAND GULF NUCLEAR STATION UNIT 1
REQUEST FOR RELIEF NO. I-00012

TABLE 1

<u>ITEM NO.</u>	<u>SYSTEM NO.</u>	<u>WELD NO.</u>	<u>ISO NO.</u>	<u>PIPE SIZE</u>	<u>COMPONENT</u>	<u>LIMITED AREA</u>	<u>TYPE SCAN</u>	<u>CLASS</u>	<u>REASON FOR LIMITATIONS</u>
1	E51	502	R1-11-7	6"	VALVE TO ELBOW	25%	T	1	RADIUS OF ELBOW

GRAND GULF NUCLEAR STATION
UNIT 1

REQUEST FOR RELIEF NO.00015

PRESERVICE INSPECTION
OF PRESSURE RETAINING WELDS

- I. Component: Inaccessible portion of Class I pressure retaining piping weld located on reactor core isolation cooling (RCIC, E51). (See Table 1 for details.)
- II. Code: This portion of the pressure retaining piping weld was designed and fabricated to the ASME Section III, Class 1 requirements. Applicable preservice inspections are to be performed in accordance with the ASME Section XI, 1977 Edition through and including Summer 1979 Addenda.
- III. Code requirements: Class 1 pressure retaining piping welds are required to be volumetrically and surface examined, essentially 100% of the weld, once every ten-year interval in accordance with ASME Section XI, Table IWB-2500-1, Category B-J.
- IV. Information to support the determination that the code requirements are impractical: A portion of the listed weld that was preservice examined has a physical obstruction due to design. Due to the limited accessibility, it is impractical to volumetrically examine 100% of the weld listed on Table 1.
- V. Specific relief requested: Permission is requested to exempt from volumetric examination the inaccessible portion of the Class 1 weld listed on Table 1.
- VI. Reasons why relief should be granted: Request for an exemption should be granted for the following reasons:
1. The entire listed weld was examined by radiography and passed in accordance with ASME Section III, Class 1 requirements.
 2. The entire listed weld was surface examined (liquid penetrant) and passed in accordance with ASME Section III and/or Section XI, Class I requirements.
 3. The listed weld was subjected to a hydrostatic test and VT-2 examination in accordance with ASME Section XI, Class 1 requirements and no leaks were found.
 4. The listed piping weld will be subject to a system leakage test after each refueling outage for Class 1 in accordance with ASME Section XI requirements.

GRAND GULF NUCLEAR STATION
UNIT 1

REQUEST FOR RELIEF NO. 00015
(Continued)
PRESERVICE INSPECTION
OF PRESSURE RETAINING WELDS

- VI. Reasons why relief should be granted:
5. The listed piping weld will be subject to a system hydrostatic test each inspection interval in accordance with ASME Section XI, Class 1 requirements.
 6. The entire listed weld, including that portion inaccessible for volumetric examination, will be surface examined each inspection interval, in accordance with ASME Section XI.
 7. Accessible portion of the listed weld will be volumetrically examined each inspection interval in accordance with ASME Section XI. Should indications be found, an engineering evaluation will be made to determine if the inaccessible portion of the listed weld has been affected.
 8. Leak detection is provided, by way of leakage detection system with continuous monitoring for the RCIC system.
 9. The failure of this weld would have no adverse effect on plant safety as there is isolation capability as part of the plant design.
- VII. Alternative testing:
- The accessible portion of the weld identified in Table 1 will be inspected twice by volumetric examination during the 10 year interval.

GRAND GULF NUCLEAR STATION UNIT 1
REQUEST FOR RELIEF NO. 00015
TABLE 1

<u>ITEM NO.</u>	<u>SYSTEM NO.</u>	<u>WELD NO.</u>	<u>ISO NO.</u>	<u>PIPE SIZE</u>	<u>COMPONENT</u>	<u>LIMITED AREA</u>	<u>TYPE SCAN</u>	<u>CLASS</u>	<u>REASON FOR LIMITATIONS</u>
1	E51	502	R1-11-7	6"	VALVE TO ELBOW	25%	T	1	RADIUS OF ELBOW