



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

DEC 26 1985

MEMORANDUM FOR: Frank Miraglia, Director  
Division of PWR Licensing - B

Robert Bernero, Director  
Division of BWR Licensing

FROM: Hugh L. Thompson, Jr, Director  
Division of PWR Licensing - A

SUBJECT: PRESERVICE INSPECTION RELIEF REQUESTS

The staff has recently granted three requests for relief from certain preservice inspections required by the ASME Boiler and Pressure Vessel Code Section XI for Grand Gulf Unit 1. The question was raised by H. Denton as to the timeliness of the submittals and our reviews, since two of them were submitted substantially after the low power operating license was issued and the third was submitted after the full power authorization.

The Materials Engineering Branch reviewed the NRC regulations, the ASME Code, and the Standard Technical Specifications to determine requirements for submittals of preservice inspection relief requests. A copy of the MTEB review memorandum is enclosed. The staff in MTEB concluded that a licensee is not in violation of 10 CFR 50.55a(g) or does not fail to meet Standard Technical Specification Paragraph 4.0.5 if the submittal of preservice inspection relief requests is made prior to the date the licensee declares the plant to be in commercial service. However, the staff also concluded that requests for relief from preservice inspections should be submitted sufficiently before plant startup that a conclusion by the staff to deny the request and require the inspection would not significantly impact plant startup. Therefore, requests submitted substantially after issuance of an operating license (for example up to 27 months for Grand Gulf Unit 1) are inappropriate. It is recognized by the staff that some preservice inspections may be required to be performed after licensing and that licensees may not have reviewed the results of preservice inspections until a significant period of time after licensing. However, preservice relief requests resulting from these activities should be infrequent.

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Based on a cursory review, the MTEB staff noted that licensees for Susquehanna 1, Limerick 1, Waterford-3, and WNP-2, in addition to Grand Gulf Unit 1, have submitted requests for relief from preservice inspection requirements after receiving an operating license. It is recommended that you survey the plants in your divisions to determine:

1. Submittal dates for unreviewed relief requests submitted on operating reactors and those scheduled for licensing in 1985 and 1986.
2. The date the licensee expects to complete its review of the Preservice Inspection Report for its plant and submit any preservice inspection relief requests resulting from that review.

The results of this survey should be used to determine any measures needed to obtain timely submittals and review of preservice inspection relief requests.

*for Steve Vargo*  
 Hugh L. Thompson, Jr., Director  
 Division of PWR Licensing - A

Enclosure:  
As stated

cc w/enclosure: H. R. Denton

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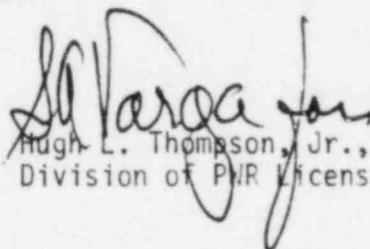
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Hugh L. Thompson, Jr., Director  
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cc w/enclosure: H. R. Denton