

**INSERVICE INSPECTION PLAN
FOR
THE COMMONWEALTH EDISON COMPANY
LASALLE COUNTY NUCLEAR STATION
UNITS 1 & 2
SECOND TEN-YEAR INSERVICE
INSPECTION INTERVAL**

**REVISION 0
10-17-94**

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SECTION 1
ISI PLAN SUMMARY

SECTION 1 - ISI PLAN SUMMARY

1.0 DESCRIPTIONS OF PLAN CONTENTS

1.1 Title Page

Provides the title, current revision and issue date for the Inservice Inspection (ISI) Plan.

1.2 Table of Contents

Provides the organizational format for the ISI Plan.

1.3 Section 1 - ISI Plan Summary

Provides an overview of the contents of the ISI Plan.

1.4 Section 2 - Introduction

Provides the scope and bases for the ISI Plan including information on the classification of systems and augmented inspection requirements.

1.5 Section 3 - Drawings

Provides a tabular summary of the applicable ISI Piping and Instrument Diagrams (P&ID's) and the ISI Isometric Drawings.

1.6 Sections 4 & 5 - Units 1 & 2 ISI Summary Tables

The Unit 1 & 2 ISI Summary Tables provide the following information:

1.6.1 Examination Category

Provides the Examination Category as identified in the American Society of Mechanical Engineers Boiler & Pressure Vessel Code (ASME) Section XI, Tables IWB-2500-1, IWC-2500-1 and IWD-2500-1. Only those categories applicable to LaSalle County Nuclear Station are identified.

1.6.2 Item Number and Description

Provides the Item Number and Description as defined in ASME Section XI, Tables IWB-2500-1, IWC-2500-1 and IWD-2500-1. Only those items applicable to LaSalle County Nuclear Station are identified.

1.6.3 Number of Components

Provides the population of components potentially subject to examination. The number of components actually examined during the inspection interval will be based on the ASME Section XI Code requirements for the subject Item Number.

1.6.4 Exam Requirements

Provides the examination method(s) required by the applicable ASME Section XI Item Number.

1.6.5 Relief Request/Code Case

Identifies by number the Relief Request(s)/Code Case applicable to the subject Item Number, if any. If a Relief Request is identified, the details can be found in Section 10, ISI RELIEF REQUESTS.

1.7 Sections 6 & 7 - Units 1 & 2 Component Support Inspection Summary Tables

Development of the Unit 1 & 2 Component Support Summary Tables is based on ASME Section XI, Code Case N-491. The tables provide the following information:

1.7.1 Examination Category

Provides the Examination Category as identified in ASME Section XI, Table IWF-2500-1. Only those categories applicable to LaSalle County Nuclear Station are identified.

1.7.2 Item Number and Description

Provides the Item Number and Description as defined in ASME Section XI, Table IWF-2500-1. Only those items applicable to LaSalle County Nuclear Station are identified.

1.7.3 Number of Components

Provides the population of components potentially subject to examination. The number of components actually examined during the inspection interval will be based on the ASME Section XI Code requirements for the subject Item Number.

1.7.4 Relief Request/Code Case

Identifies by number the Relief Request(s)/Code Case applicable to the subject Item Number, if any. If a Relief Request is identified, the details can be found in Section 10, ISI RELIEF REQUESTS.

1.8 Section 8 - ISI Component Relief Requests

This section contains Relief Requests written in accordance with 10 CFR 50.55a (g)(5) when specific ASME Section XI ISI requirements are considered impractical. The enclosed Relief Requests are subject to change throughout the inspection interval. If any examination requirements are determined to be impractical during the course of the inspection interval, additional or modified Relief Requests will be submitted in accordance with 10 CFR 50.55a (g)(5).

1.9 Sections 9 & 10 - Units 1 & 2 Pressure Testing Summary Tables

The Unit 1 & 2 Pressure Testing Summary Tables provide the following information:

1.9.1 Examination Category

Provides the Examination Category as identified in ASME Section XI, Tables IWB-2500-1, IWC-2500-1 and IWD-2500-1. Only those categories applicable to LaSalle County Nuclear Station are identified.

1.9.2 Item Number and Description

Provides the Item Number and Description as defined in ASME Section XI, Tables IWB-2500-1, IWC-2500-1 and IWD-2500-1. Only those items applicable to LaSalle County Nuclear Station are identified.

1.9.3 Relief Request/Code Case

Identifies by number the Relief Request(s)/Code Case applicable to the subject Item Number, if any. If a Relief Request is identified, the details can be found in Section 10, ISI RELIEF REQUESTS.

1.10 Section 11 - Pressure Testing Relief Requests

This section contains Relief Requests, specifically related to the pressure testing program, written in accordance with 10 CFR 50.55a (g)(5) when specific ASME Section XI ISI requirements are considered impractical. The enclosed Relief Requests are subject to change throughout the inspection interval. If any examination requirements are determined to be impractical during the course of the inspection interval, additional or modified Relief Requests will be submitted in accordance with 10 CFR 50.55a (g)(5).

1.11 Section 12 - Code Cases

This section contains the Code Cases listed in Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability ASME Section XI Division 1, applicable to LCNS that are, or may be, utilized in the implementation of this ISI Plan.

1.12 Section 13 - References

This section provides a listing of the documents utilized in the preparation of this ISI Plan.

SECTION 2
INTRODUCTION

SECTION 2 - INTRODUCTION

1.0 SCOPE

1.1 This ISI Plan outlines the applicable rules and requirements for the Non-Destructive Examination (NDE) of ISI Class 1, 2 and 3 (Equivalent to Quality Groups A, B and C) pressure retaining components and their supports at LaSalle County Nuclear Station Units 1 & 2 (LCNS).

1.2 This ISI Plan will be in effect for the entirety of the ISI Program second ten-year inspection interval at LCNS. The effective dates for each unit are as follows:

Unit 1 - November 23, 1994 through November 22, 2004.

Unit 2 - October 17, 1994 through October 16, 2004.

1.3 The sections that follow present a summary of the documents and actions required for the execution of the ISI Plan. The details of the ISI Program are contained in other documents which are available at LCNS.

1.4 The Inservice Testing (IST) of pumps and valves is addressed in a separate Plan.

2.0 ISI PLAN BASES

2.1 This Plan was developed in accordance with the requirements of 10 CFR 50.55a including all published changes through November 22, 1993 and October 16, 1993 for Units 1 and 2 respectively, and the 1989 Edition of ASME Section XI. This Plan addresses Subsections IWA, IWB, IWC, IWD and IWF of ASME Section XI, and utilizes Inspection Program B as defined therein.

2.2 The commercial service dates for LCNS Units 1 and 2 are January 1, 1984 and October 17, 1984 respectively. At the end of the first fuel cycle, Unit 1 endured a refueling outage that lasted 329 consecutive days. Paragraph IWA-2430(e) of ASME Section XI allows an inspection interval to be extended for a period of time equivalent to the duration of a continuous outage that exceeds six months. Therefore, the start date of the Unit 1 second inspection interval reflects an extension of the first inspection interval by 329 days.

2.3 The following documents present detailed bases for the contents of this Plan:

2.3.1 BASES DOCUMENT FOR LASALLE COUNTY STATION UNITS

1 & 2 SECOND INTERVAL INSERVICE INSPECTION PROGRAMS

2.3.2 PIPING & COMPONENT SUPPORT AND INTEGRAL ATTACHMENT BASES DOCUMENT FOR LASALLE COUNTY STATION UNITS 1 & 2 SECOND INTERVAL INSERVICE INSPECTION PROGRAMS

3.0 SYSTEM CLASSIFICATION

- 3.1 The construction permits for LCNS Units 1 and 2 were issued on September 10, 1973. The construction codes utilized are identified in the LCNS Final Safety Analysis Report (FSAR), Section 3.2, Tables 3.2-2, 3.2-3 and 3.2-4 for general categories of components.
- 3.2 The system classifications used for the ISI Program are based on 10 CFR 50 and Regulatory Guide 1.26, Revision 3. These classifications were developed for the sole purpose of assigning appropriate ISI requirements for water, steam and radioactive waste containing components.
- 3.3 Components within the reactor coolant pressure boundary, as defined in 10 CFR 50.2, are designated as ISI Class 1. Other safety related components are designated as ISI Class 2 or 3 in accordance with Regulatory Guide 1.26, Revision 3. Pursuant to 10 CFR 50.55a, paragraph (a)(1), the ISI requirements of ASME Section XI, are assigned to these components within the constraints of existing plant design.
- 3.4 The LCNS P&ID's show the classification boundaries. The LCNS ISI Program includes color coded Classification Boundary Drawings (CBD's) which show the ISI classification boundaries. A listing of the ISI Class 1, 2 and 3 systems, including acronyms, and their associated CBD's can be found in Section 3 of this Plan.
- 3.5 The LCNS ISI Isometric Drawings show the location of piping and components subject to ISI. A listing of these drawings can be found in Section 2 of this Plan.

4.0 AUGMENTED ISI REQUIREMENTS

- 4.1 Augmented inspections are those which fall outside the scope of ASME Section XI requirements, but which are included in the scope of the ISI Program due to licensing and regulatory commitments.
- 4.2 The augmented inspections that will be performed in the second ISI interval belong in one of the three following categories:
- A. Alternative examinations imposed by Relief Requests.
 - B. Augmented inspections required by the commission (i.e. Generic Letters and NUREG's).
 - C. Miscellaneous docketed commitments.

Category A above is addressed elsewhere in this ISI Plan. The Category B and C augmented inspections are summarized in the following paragraphs.

- 4.3 LCNS is complying with the following augmented ISI requirements in accordance with the latest pertinent licensing agreements:
- 4.3.1 Generic Letter 88-01, NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping.
 - 4.3.2 LaSalle FSAR responses to NRC questions 111.72 and 111.81, Examination of the High Energy Line Break (HELB) Exclusion Region.
 - 4.3.3 NUREG-0519, Safety Evaluation Report Related to the Operation of LaSalle County Station Units 1 and 2, Examination of the Reactor Building Closed Cooling Water System.
 - 4.3.4 NUREG-0619, Examination of Feedwater Nozzles.
 - 4.3.5 I.E. Bulletin No. 80-13, Examination of High and Low Pressure Core Spray Spargers.
 - 4.3.6 Examination of Reactor Core Isolation Coolant lines exempt per ASME Section XI, Subsection IWC, Paragraph 1220(b).
 - 4.3.7 NUREG-0800, Examination of Class D+ pressure retaining components, LaSalle Main Steam lines from the first outside containment isolation valves to the turbine stop valves.

- 4.3.8 NUREG-CR-3052, Closeout of I.E. Bulletin 80-07: Jet Pump Assembly Failure. Ultrasonic Examination of jet pump hold down beams once each ISI Interval.

SECTION 3
DRAWINGS

SECTION 3 - DRAWINGS

**LASALLE COUNTY NUCLEAR STATION
 ISI CLASSIFICATION BOUNDARY DRAWINGS**

SYSTEM	UNIT 1 DWG. NO.	UNIT 2 DWG. NO.	ACRONYM
MAIN STEAM	M-55	M-116	MS
EXTRACTION STEAM	M-56	M-117	ES
FEEDWATER	M-57	M-118	FW
DRYWELL PNEUMATIC	M-66	M-66	IN
CYCLED CONDENSATE STORAGE	M-74	M-127	CY
CLEAN CONDENSATE STORAGE	M-75	M-75	MC
INSTRUMENT AIR	M-81	M-81	IA
SERVICE AIR	M-82	M-82	SA
DIESEL GENERATOR AUXILIARY	M-83	M-83	DG
DIESEL OIL	M-85	M-132	DO
PRIMARY CONTAINMENT CHILLED WATER	M-86	M-133	VP
CSCS EQUIPMENT COOLING WATER	M-87	M-134	
REACTOR BUILDING CLOSED COOLING WATER	M-90	M-136	WR
REACTOR BUILDING EQUIPMENT DRAINS	M-91	M-137	RF
PRIMARY CONTAINMENT VENT AND PURGE	M-92	M-138	VQ
NUCLEAR BOILING AND REACTOR RECIRCULATING	M-93	M-139	NB & RR
LOW PRESSURE CORE SPRAY	M-94	M-140	LP, LPCS
HIGH PRESSURE CORE SPRAY	M-95	M-141	HP, HPCS
RESIDUAL HEAT REMOVAL	M-96	M-142	RH, RHRS
REACTOR WATER CLEANUP	M-97	M-143	RT
FUEL POOL COOLING AND DEMINERALIZING	M-98	M-98 & M-144	FC
STANDBY LIQUID CONTROL	M-99	M-145	SC
CONTROL ROD DRIVE HYDRAULICS	M-100	M-146	RD
REACTOR CORE ISOLATION COOLANT	M-101	M-147	RI, RCIC

SYSTEM	UNIT 1 DWG. NO.	UNIT 2 DWG. NO.	ACRONYM
CONTAINMENT COMBUSTIBLE GAS CONTROL	M-130	M-130	HG
CONTAINMENT MONITORING	M-156	M-158	CM

**LASALLE COUNTY NUCLEAR STATION
 ISI ISOMETRIC DRAWINGS**

SYSTEM	UNIT 1 DRAWING NUMBER(S)	UNIT 2 DRAWING NUMBER(S)
FEEDWATER	ISI-FW-1001 THROUGH ISI-FW-1003	ISI-FW-2001 THROUGH ISI-FW-2003
HIGH PRESSURE CORE SPRAY	ISI-HP-1001 THROUGH ISI-HP-1007	ISI-HP-2001 THROUGH ISI-HP-2008
LOW PRESSURE CORE SPRAY	ISI-LP-1001 THROUGH ISI-LP-1003 ISI-LP-1010 THROUGH ISI-LP-1014	ISI-LP-2001 THROUGH ISI-LP-2003 ISI-LP-2010 THROUGH ISI-LP-2014
MAIN STEAM	ISI-MS-1001 THROUGH ISI-MS-1004 ISI-MS-1036 THROUGH ISI-MS-1046 ISI-MS-1048 THROUGH ISI-MS-1049 ISI-MS-1051 THROUGH ISI-MS-1055	ISI-MS-2001 THROUGH ISI-MS-2004 ISI-MS-2036 THROUGH ISI-MS-2046 ISI-MS-2048 THROUGH ISI-MS-2049 ISI-MS-2051 THROUGH ISI-MS-2055
NUCLEAR BOILING	ISI-NB-1001 THROUGH ISI-NB-1002	ISI-NB-2001 THROUGH ISI-NB-2002
REACTOR RECIRCULATING	ISI-RR-1001 THROUGH ISI-RR-1003 ISI-RR-1005 THROUGH ISI-RR-1010	ISI-RR-2001 THROUGH ISI-RR-2003 ISI-RR-2005 THROUGH ISI-RR-2010
REACTOR CORE ISOLATION COOLANT	ISI-RI-1001 THROUGH ISI-RI-1022 ISI-RI-1026 THROUGH ISI-RI-1029 ISI-RI-1033	ISI-RI-2001 THROUGH ISI-RI-2023 ISI-RI-2028 THROUGH ISI-RI-2030
REACTOR WATER CLEANUP	ISI-RT-1001	ISI-RT-2001
RESIDUAL HEAT REMOVAL	ISI-RH-1001 THROUGH ISI-RH-1020 ISI-RH-1022 THROUGH ISI-RH-1078 ISI-RH-1126 THROUGH ISI-RH-1128	ISI-RH-2001 THROUGH ISI-RH-2056 ISI-RH-2058 THROUGH ISI-RH-2083
STANDBY LIQUID CONTROL	ISI-SC-1001 THROUGH ISI-SC-1002	ISI-SC-2001 THROUGH ISI-SC-2002

SECTION 4
UNIT 1 ISI SUMMARY TABLE

UNIT 1
ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ REQUEST CODE CASE
B-A	B1.11	CIRCUMFERENTIAL SHELL WELDS	5	2 (NOTE 4)	5	VOLUMETRIC	CR-05
	B1.12	LONGITUDINAL SHELL WELDS	15	5 (NOTE 4)	15	VOLUMETRIC	CR-05
	B1.21	CIRCUMFERENTIAL HEAD WELDS	4	2 (NOTE 4)	4	VOLUMETRIC	CR-05
	B1.22	MERIDIONAL HEAD WELDS	31	11 (NOTE 4)	31	VOLUMETRIC	CR-05
	B1.30	SHELL TO FLANGE WELD	1	1 (NOTE 5)	1	VOLUMETRIC	CR-05
	B1.40	HEAD TO FLANGE WELD	1	1 (NOTE 5)	1	VOLUMETRIC & SURFACE	CR-05
B-D	B3.90	REACTOR VESSEL NOZZLE TO VESSEL WELDS	33	11 (NOTE 4)	33	VOLUMETRIC	CR-05
	B3.100	REACTOR VESSEL NOZZLE INSIDE RADIUS SECTION	33	11	33	VOLUMETRIC	CR-05 CR-09
B-E	B4.11	VESSEL NOZZLE PARTIAL PENETRATION WELDS	11	11 (NOTE 1 & 4)	11	VISUAL, VT-2	
	B4.12	CONTROL ROD DRIVE NOZZLE PARTIAL PENETRATION WELDS	185	185 (NOTE 1 & 4)	185	VISUAL, VT-2	
	B4.13	INSTRUMENTATION NOZZLE PARTIAL PENETRATION WELDS	55	55 (NOTE 1 & 4)	55	VISUAL, VT-2	
B-F	B5.10	REACTOR VESSEL NPS 4 OR LARGER NOZZLE TO SAFE END BUTT WELDS	23	8	23	VOLUMETRIC & SURFACE	CR-04 CR-05
	B5.130	PIPING NPS 4 OR LARGER DISSIMILAR METAL BUTT WELDS	19	7	19	VOLUMETRIC & SURFACE	CR-04 CR-05

UNIT 1
ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
B-G-1	B6.10	REACTOR VESSEL CLOSURE HEAD NUTS	68	23	68	SURFACE	CR-06
	B6.20	REACTOR VESSEL CLOSURE STUDS, IN PLACE	68	23	68	VOLUMETRIC	CR-05 CR-07
	B6.40	REACTOR VESSEL THREADS IN FLANGE	68	23	68	VOLUMETRIC	CR-05
	B6.50	REACTOR VESSEL CLOSURE WASHERS, BUSHINGS	68	23	68	VISUAL, VT-1	
	B6.180	PUMP BOLTS AND STUDS	2	1	2	VOLUMETRIC	CR-05
	B6.190	PUMP FLANGE SURFACE	2	1	2	VISUAL, VT-1	
	B6.200	PUMP NUTS, BUSHINGS, AND WASHERS	2	1	2	VISUAL, VT-1	
	B6.210	VALVE BOLTS AND STUDS	4	1	4	VOLUMETRIC	CR-05
	B6.220	VALVE FLANGE SURFACE	4	1	4	VISUAL, VT-1	
	B6.230	VALVE NUTS, BUSHINGS, AND WASHERS	4	1	4	VISUAL, VT-1	
B-G-2	B7.50	PIPING BOLTS, STUDS, AND NUTS	29	(NOTE 6)	(NOTE 6)	VISUAL, VT-1	
	B7.70	VALVE BOLTS, STUDS, AND NUTS	97	(NOTE 6)	(NOTE 6)	VISUAL, VT-1	
	B7.80	CRD HOUSING BOLTS, STUDS, AND NUTS	185	(NOTE 8)	(NOTE 8)	VISUAL, VT-1	CR-16
B-H	B8.10	REACTOR VESSEL INTEGRALLY WELDED ATTACHMENTS	7	3	7	VOLUMETRIC OR SURFACE	CR-14 CR-15

UNIT 1
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
B-J	B9.11	CIRCUMFERENTIAL WELDS NPS 4 OR LARGER	650	54	163	SURFACE & VOLUMETRIC	CR-01 CR-04 CR-05 CR-10
	B9.12	LONGITUDINAL WELDS NPS 4 OR LARGER	289	(NOTE 7)	(NOTE 7)	SURFACE & VOLUMETRIC	CR-01 CR-05 CR-10 CR-15
	B9.21	CIRCUMFERENTIAL WELDS LESS THAN NPS 4	93	8	24	SURFACE	CR-10
	B9.31	BRANCH PIPE CONNECTION WELDS NPS 4 OR LARGER	31	3	8	SURFACE & VOLUMETRIC	CR-04 CR-05 CR-10
	B9.32	BRANCH PIPE CONNECTION WELDS < NPS 4	14	2	4	SURFACE	CR-10
B-K-1	B10.10	INTEGRALLY WELDED ATTACHMENTS TO PIPING	62	21	62	VOLUMETRIC OR SURFACE	
	B10.20	INTEGRALLY WELDED ATTACHMENTS TO PUMPS	2	1	2	VOLUMETRIC OR SURFACE	
B-L-2	B12.20	PUMP CASING	2	(NOTE 8 & 4)	(NOTE 8)	VISUAL, VT-3	
B-M-2	B12.50	VALVE BODY, EXCEEDING NPS 4	69	(NOTE 8 & 4)	(NOTE 8)	VISUAL, VT-3	
B-N-1	B13.10	REACTOR VESSEL INTERIOR	1	1	1	VISUAL, VT-3	

UNIT 1
 ISI SUMMARY TABLE

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B-N-2	B13.20	REACTOR VESSEL INTERIOR ATTACHMENTS WITHIN BELTLINE REGION	23	(NOTE 4)	23	VISUAL, VT-1	
	B13.30	REACTOR VESSEL INTERIOR ATTACHMENTS BEYOND BELTLINE REGION	56	(NOTE 4)	56	VISUAL, VT-3	
	B13.40	REACTOR VESSEL CORE SUPPORT STRUCTURE	2	(NOTE 4)	2	VISUAL, VT-3	
B-O	B14.10	WELDS IN CRD HOUSING	185	2 (NOTE 4)	4	VOLUMETRIC OR SURFACE	
C-A	C1.10	SHELL CIRCUMFERENTIAL WELDS IN PRESSURE VESSELS	8	2 (NOTE 9)	4 (NOTE 9)	VOLUMETRIC	CR-05
	C1.30	TUBESHEET TO SHELL WELDS IN PRESSURE VESSELS	2	1 (NOTE 9)	2 (NOTE 9)	VOLUMETRIC	
C-B	C2.21	NOZZLE TO SHELL (OR HEAD) WELD WITHOUT REINFORCING PLATE IN PRESSURE VESSELS > 1/2 INCH NOMINAL THICKNESS	4	1 (NOTE 9)	2 (NOTE 9)	VOLUMETRIC AND SURFACE	
	C2.22	NOZZLE INSIDE RADIUS SECTION WITHOUT REINFORCING PLATE IN PRESSURE VESSELS > 1/2 INCH NOMINAL THICKNESS	4	1 (NOTE 9)	2 (NOTE 9)	VOLUMETRIC AND SURFACE	

UNIT 1
 ISI SUMMARY TABLE

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C-C	C3.10	INTEGRALLY WELDED ATTACHMENTS TO PRESSURE VESSELS	48	8 (NOTE 9)	24 (NOTE 9)	SURFACE	
	C3.20	INTEGRALLY WELDED ATTACHMENTS TO PIPING	209	70	209	SURFACE	
	C3.30	INTEGRALLY WELDED ATTACHMENTS TO PUMPS	5	1 (NOTE 9)	3 (NOTE 9)	SURFACE	
C-F-1	C5.11	CIRCUMFERENTIAL WELDS IN AUSTENITIC STAINLESS STEEL OR HIGH ALLOY PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	105	10 (NOTE 10)	28 (NOTE 10)	VOLUMETRIC AND SURFACE	CR-05 CR-10
	C5.12	LONGITUDINAL WELDS IN AUSTENITIC STAINLESS STEEL OR HIGH ALLOY PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	126	(NOTE 7)	(NOTE 7)	VOLUMETRIC AND SURFACE	CR-05 CR-10 CR-15

UNIT 1
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
C-F-2	C5.51	CIRCUMFERENTIAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	1086	27	82	VOLUMETRIC AND SURFACE	CR-01 CR-05 CR-10
	C5.52	LONGITUDINAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	158	(NOTE 7)	(NOTE 7)	VOLUMETRIC AND SURFACE	CR-01 CR-05 CR-10 CR-15
	C5.81	CIRCUMFERENTIAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING BRANCH CONNECTIONS OF BRANCH PIPING > NPS 4 (SEE NOTE 3)	31	1	3	SURFACE	CR-02 CR-10
	C5.82	LONGITUDINAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING BRANCH CONNECTIONS OF BRANCH PIPING > NPS 4 (SEE NOTE 3)	8	(NOTE 7)	(NOTE 7)	SURFACE	CR-02 CR-10 CR-15
C-G	C6.10	PUMP CASING WELDS	63	13 (NOTE 9)	37 (NOTE 9)	SURFACE	

UNIT 1
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D-A	D1.20	INTEGRAL ATTACHMENT - COMPONENT SUPPORTS AND RESTRAINTS	149	50	149	VISUAL, VT-3	
	D1.30	INTEGRAL ATTACHMENT - MECHANICAL AND HYDRAULIC SNUBBERS	53	18	53	VISUAL, VT-3	
	D1.40	INTEGRAL ATTACHMENT - SPRING TYPE SUPPORTS	6	2	6	VISUAL, VT-3	
	D1.50	INTEGRAL ATTACHMENTS - CONSTANT LOAD TYPE SUPPORTS	16	6	16	VISUAL, VT-3	
D-B	D2.20	INTEGRAL ATTACHMENT - COMPONENT SUPPORTS AND RESTRAINTS	29	10	29	VISUAL, VT-3	
	D2.30	INTEGRAL ATTACHMENT - MECHANICAL AND HYDRAULIC SNUBBERS	7	3	7	VISUAL, VT-3	
	D2.40	INTEGRAL ATTACHMENT - SPRING TYPE SUPPORTS	8	3	8	VISUAL, VT-3	

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 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
D-C	D3.20	INTEGRAL ATTACHMENT - COMPONENT SUPPORTS AND RESTRAINTS	96	32	96	VISUAL, VT-3	
	D3.30	INTEGRAL ATTACHMENT - MECHANICAL AND HYDRAULIC SNUBBERS	9	3	9	VISUAL, VT-3	
	D3.40	INTEGRAL ATTACHMENT - SPRING TYPE SUPPORTS	14	4	14	VISUAL, VT-3	

NOTES: 1. 100% OF CATEGORY B-E ITEMS ARE EXAMINED DURING EACH LEAKAGE TEST AND DURING THE 10 YEAR HYDROSTATIC TEST

2. THE NUMBER OF COMPONENTS IDENTIFIED INCLUDES THOSE WELDS IN PIPING < 3/8" NOMINAL WALL THICKNESS IN ACCORDANCE WITH TABLE IWC-2500-1, CATEGORIES C-F-1 AND C-F-2.

3. REFERENCE TABLE IWC-2500-1, CATEGORIES C-F-1 AND C-F-2, NOTE 1 AS TO THE OMISSION OF PIPING WELDS > OR = 2 NPS AND < OR = 4 NPS

4. DEFERRAL TO END OF INTERVAL IS PERMISSIBLE

5. PARTIAL DEFERRAL TO END OF INTERVAL IS PERMISSIBLE

6. EXAMINATIONS ARE LIMITED TO THOSE COMPONENTS SELECTED FOR EXAMINATION UNDER THE APPLICABLE CATEGORY OF B-J, B-L-2, OR B-M-2

UNIT 1
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
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7. THE LONGITUDINAL WELDS TO BE EXAMINED ARE THOSE ASSOCIATED WITH THE CIRCUMFERENTIAL WELDS CHOSEN FOR EXAMINATION IN THE ITEM ABOVE

8. EXAMINATION IS ONLY REQUIRED WHEN COMPONENT IS DISASSEMBLED.

9. THE EXAMINATIONS MAY BE LIMITED TO ONE COMPONENT IN THE CASE OF MULTIPLE COMPONENTS OF SIMILAR DESIGN, SIZE AND SERVICE.

10. THE NUMBER OF COMPONENTS TO BE EXAMINED THIS INTERVAL EXCEEDS THE 7.5% SAMPLE SIZE IN ORDER TO MEET THE MINIMUM SAMPLE SIZE AS SET FORTH IN TABLE 2500-1, CATEGORY C-F-1, NOTE 2.

SECTION 5
UNIT 2 ISI SUMMARY TABLE

UNIT 2
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON- EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
B-A	B1.11	CIRCUMFERENTIAL SHELL WELDS	4	2 (NOTE 4)	4	VOLUMETRIC	CR-05
	B1.12	LONGITUDINAL SHELL WELDS	12	4 (NOTE 4)	12	VOLUMETRIC	CR-05
	B1.21	CIRCUMFERENTIAL HEAD WELDS	2	1 (NOTE 4)	2	VOLUMETRIC	CR-05
	B1.22	MERIDIONAL HEAD WELDS	14	5 (NOTE 4)	14	VOLUMETRIC	CR-05
	B1.30	SHELL TO FLANGE WELD	1	1 (NOTE 5)	1	VOLUMETRIC	CR-05
	B1.40	HEAD TO FLANGE WELD	1	1 (NOTE 5)	1	VOLUMETRIC & SURFACE	
	B3.90	REACTOR VESSEL NOZZLE TO VESSEL WELDS	33	11 (NOTE 4)	33	VOLUMETRIC	CR-05
	B3.100	REACTOR VESSEL NOZZLE INSIDE RADIUS SECTION	33	11	33	VOLUMETRIC	CR-05 CR-09
B-E	B4.11	VESSEL NOZZLE PARTIAL PENETRATION WELDS	11	11 (NOTE 1 & 4)	11	VISUAL, VT-2	
	B4.12	CONTROL ROD DRIVE NOZZLE PARTIAL PENETRATION WELDS	185	185 (NOTE 1 & 4)	185	VISUAL, VT-2	
	B4.13	INSTRUMENTATION NOZZLE PARTIAL PENETRATION WELDS	55	55 (NOTE 1 & 4)	55	VISUAL, VT-2	
B-F	B5.10	REACTOR VESSEL NPS 4 OR LARGER NOZZLE TO SAFE END BUTT WELDS	33	11	33	VOLUMETRIC & SURFACE	CR-04 CR-05
	B5.130	PIPING NPS 4 OR LARGER DISSIMILAR METAL BUTT WELDS	13	5	13	VOLUMETRIC & SURFACE	CR-04 CR-05

UNIT 2
ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
	B6.10	REACTOR VESSEL CLOSURE HEAD NUTS	76	26	76	SURFACE	CR-06
	B6.20	REACTOR VESSEL CLOSURE STUDS, IN PLACE	76	26	76	VOLUMETRIC	CR-05 CR-07
	B6.40	REACTOR VESSEL THREADS IN FLANGE	76	26	76	VOLUMETRIC	CR-05 CR-07
	B6.50	REACTOR VESSEL CLOSURE WASHERS, BUSHINGS	76	26	76	VISUAL, VT-1	
B-G-1	B6.180	PUMP BOLTS AND STUDS	2	1	2	VOLUMETRIC	CR-05
	B6.190	PUMP FLANGE SURFACE	2	1	2	VISUAL, VT-1	
	B6.200	PUMP NUTS, BUSHINGS, AND WASHERS	2	1	2	VISUAL, VT-1	
	B6.210	VALVE BOLTS AND STUDS	4	1	4	VOLUMETRIC	CR-05
	B6.220	VALVE FLANGE SURFACE	4	1	4	VISUAL, VT-1	
	B6.230	VALVE NUTS, BUSHINGS, AND WASHERS	4	1	4	VISUAL, VT-1	
	B7.50	PIPING BOLTS, STUDS, AND NUTS	29	(NOTE 6)	(NOTE 6)	VISUAL, VT-1	
B-G-2	B7.70	VALVE BOLTS, STUDS, AND NUTS	102	(NOTE 6)	(NOTE 6)	VISUAL, VT-1	
	B7.80	CRD HOUSING BOLTS, STUDS, AND NUTS	185	(NOTE 6)	(NOTE 6)	VISUAL, VT-1	CR-16
B-H	B8.10	REACTOR VESSEL INTEGRALLY WELDED ATTACHMENTS	7	3	7	VOLUMETRIC OR SURFACE	CR-05 CR-14

UNIT 2
ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF N/N-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
B-J	B9.11	CIRCUMFERENTIAL WELDS NPS 4 OR LARGER	650	55	163	SURFACE & VOLUMETRIC	CR-01 CR-04 CR-05 CR-10
	B9.12	LONGITUDINAL WELDS NPS 4 OR LARGER	344	(NOTE 7)	(NOTE 7)	SURFACE & VOLUMETRIC	CR-01 CR-05 CR-10 CR-15
	B9.21	CIRCUMFERENTIAL WELDS LESS THAN NPS 4	64	6	16	SURFACE	CR-10
B-K-1	B9.31	BRANCH PIPE CONNECTION WELDS NPS 4 OR LARGER	34	3	9	SURFACE & VOLUMETRIC	CR-04 CR-05 CR-10
	B9.32	BRANCH PIPE CONNECTION WELDS < NPS 4	9	1	3	SURFACE	CR-10
B-L-2	B10.10	INTEGRALLY WELDED ATTACHMENTS TO PIPING	113	38	113	VOLUMETRIC OR SURFACE	
	B10.20	INTEGRALLY WELDED ATTACHMENTS TO PUMPS	2	1	2	VOLUMETRIC OR SURFACE	
B-M-2	B12.20	PUMP CASING	2	(NOTE 8 & 4)	(NOTE 8)	VISUAL, VT-3	
B-N-1	B12.50	VALVE BODY, EXCEEDING NPS 4	72	(NOTE 8 & 4)	(NOTE 8)	VISUAL, VT-3	
B-N-1	B13.10	REACTOR VESSEL INTERIOR	1	1	1	VISUAL, VT-3	

UNIT 2
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXCEPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
B-N-2	B13.20	REACTOR VESSEL INTERIOR ATTACHMENTS WITHIN BELTLINE REGION	23	(NOTE 4)	23	VISUAL, VT-1	
	B13.30	REACTOR VESSEL INTERIOR ATTACHMENTS BEYOND BELTLINE REGION	34	(NOTE 4)	34	VISUAL, VT-3	
	B13.40	REACTOR VESSEL CORE SUPPORT STRUCTURE	2	(NOTE 4)	2	VISUAL, VT-3	
B-O	WELDS IN CRD HOUSING	185	2 (NOTE 4)	4	VOLUMETRIC OR SURFACE		
C-A	C1.10	SHELL CIRCUMFERENTIAL WELDS IN PRESSURE VESSELS	8	2 (NOTE 9)	4 (NOTE 9)	VOLUMETRIC	CR-05
	C1.30	TUBESHEET TO SHELL WELDS IN PRESSURE VESSELS	2	1 (NOTE 9)	2 (NOTE 9)	VOLUMETRIC	
C-B	C2.21	NOZZLE TO SHELL (OR HEAD) WELD WITHOUT REINFORCING PLATE IN PRESSURE VESSELS > 1/2 INCH NOMINAL THICKNESS	4	1 (NOTE 5)	2 (NOTE 9)	VOLUMETRIC AND SURFACE	
	C2.22	NOZZLE INSIDE RADIUS WITHOUT REINFORCING PLATE IN PRESSURE VESSELS > 1/2 INCH NOMINAL THICKNESS	4	1 (NOTE 9)	2 (NOTE 9)	VOLUMETRIC AND SURFACE	
C-C	C3.10	INTEGRALLY WELDED ATTACHMENTS TO PRESSURE VESSELS	48	8 (NOTE 9)	24 (NOTE 9)	SURFACE	
	C3.20	INTEGRALLY WELDED ATTACHMENTS TO PIPING	290	97	290	SURFACE	
	C3.30	INTEGRALLY WELDED ATTACHMENTS TO PUMPS	5	1 (NOTE 9)	3 (NOTE 9)	SURFACE	

UNIT 2
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
C-F-1	C5.11	CIRCUMFERENTIAL WELDS IN AUSTENITIC STAINLESS STEEL OR HIGH ALLOY PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	76	2 (NOTE 10)	6 (NOTE 10)	VOLUMETRIC AND SURFACE	CR-05 CR-10
	C5.12	LONGITUDINAL WELDS IN AUSTENITIC STAINLESS STEEL OR HIGH ALLOY PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	150	(NOTE 7)	(NOTE 7)	VOLUMETRIC AND SURFACE	CR-05 CR-10 CR-15
C-F-2	C5.51	CIRCUMFERENTIAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	1223	31	92	VOLUMETRIC AND SURFACE	CR-01 CR-05 CR-10
	C5.52	LONGITUDINAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING > OR = 3/8" NOMINAL WALL THICKNESS FOR PIPING > NPS 4 (SEE NOTE 2)	162	(NOTE 7)	(NOTE 7)	VOLUMETRIC AND SURFACE	CR-01 CR-05 CR-10 CR-15
	C5.81	CIRCUMFERENTIAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING BRANCH CONNECTIONS OF BRANCH PIPING > NPS 4 (SEE NOTE 3)	23	1	2	SURFACE	CR-02 CR-10
	C5.82	LONGITUDINAL WELDS IN CARBON OR LOW ALLOY STEEL PIPING BRANCH CONNECTIONS OF BRANCH PIPING > NPS 4 (SEE NOTE 3)	7	(NOTE 7)	(NOTE 7)	SURFACE	CR-02 CR-10 CR-15
C-G	C6.10	PUMP CASING WELDS	63	13 (NOTE 9)	37 (NOTE 9)	SURFACE	

UNIT 2
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ COLE CASE
D-A	D1.20	INTEGRAL ATTACHMENT - COMPONENT SUPPORTS AND RESTRAINTS	149	50	149	VISUAL, VT-3	
	D1.30	INTEGRAL ATTACHMENT - MECHANICAL AND HYDRAULIC SNUBBERS	53	18	53	VISUAL, VT-3	
	D1.40	INTEGRAL ATTACHMENT - SPRING TYPE SUPPORTS	6	2	6	VISUAL, VT-3	
	D1.50	INTEGRAL ATTACHMENTS - CONSTANT LOAD TYPE SUPPORTS	16	6	16	VISUAL, VT-3	
D-B	D2.20	INTEGRAL ATTACHMENT - COMPONENT SUPPORTS AND RESTRAINTS	50	17	50	VISUAL, VT-3	
	D2.30	INTEGRAL ATTACHMENT - MECHANICAL AND HYDRAULIC SNUBBERS	4	2	4	VISUAL, VT-3	
	D2.40	INTEGRAL ATTACHMENT - SPRING TYPE SUPPORTS	5	2	5	VISUAL, VT-3	
D-C	D3.20	INTEGRAL ATTACHMENT - COMPONENT SUPPORTS AND RESTRAINTS	100	34	100	VISUAL, VT-3	
	D3.30	INTEGRAL ATTACHMENT - MECHANICAL AND HYDRAULIC SNUBBERS	1	1	1	VISUAL, VT-3	
	D3.40	INTEGRAL ATTACHMENT - SPRING TYPE SUPPORTS	8	3	8	VISUAL, VT-3	

NOTES:
 1. 100% OF CATEGORY B-2 ITEMS ARE EXAMINED DURING EACH LEAKAGE TEST AND DURING THE 10 YEAR HYDROSTATIC TEST

UNIT 2
 ISI SUMMARY TABLE

EXAM CATEGORY	ITEM NO.	DESCRIPTION	NUMBER OF NON- EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUEST/ CODE CASE
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2. THE NUMBER OF COMPONENTS IDENTIFIED INCLUDES THOSE WELDS IN PIPING < 3/8" NOMINAL WALL THICKNESS IN ACCORDANCE WITH TABLE IWC-2500-1, CATEGORIES C-F-1 AND C-F-2.

3. REFERENCE TABLE IWC-2500-1, CATEGORIES C-F-1 AND C-F-2, NOTE 1 AS TO THE OMISSION OF PIPING WELDS > OR = 2 NPS AND < OR = 4 NPS

4. DEFERRAL TO END OF INTERVAL IS PERMISSIBLE

5. PARTIAL DEFERRAL TO END OF INTERVAL IS PERMISSIBLE

6. EXAMINATIONS ARE LIMITED TO THOSE COMPONENTS SELECTED FOR EXAMINATION UNDER THE APPLICABLE CATEGORY OF B-J, B-L-2, OR B-M-2

7. THE LONGITUDINAL WELDS TO BE EXAMINED ARE THOSE ASSOCIATED WITH THE CIRCUMFERENTIAL WELDS CHOSEN FOR EXAMINATION IN THE ITEM ABOVE

8. EXAMINATION IS ONLY REQUIRED WHEN COMPONENT IS DISASSEMBLED.

9. THE EXAMINATIONS MAY BE LIMITED TO ONE COMPONENT IN THE CASE OF MULTIPLE COMPONENTS OF SIMILAR DESIGN, SIZE AND SERVICE.

10. THE NUMBER OF COMPONENTS TO BE EXAMINED THIS INTERVAL EXCEEDS THE 7.5% SAMPLE SIZE IN ORDER TO MEET THE MINIMUM SAMPLE SIZE AS SET FORTH IN TABLE 2500-1, CATEGORY C-F-1, NOTE 2.

SECTION 6

UNIT 1 COMPONENT SUPPORT INSPECTION SUMMARY TABLE

UNIT 1
COMPONENT SUPPORT
INSPECTION SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUESTS/ CODE CASE
F-A	F1.10	CLASS 1 PIPING SUPP. VTS	420	35	105	VISUAL VT-3	N-491 CR-12
	F1.20	CLASS 2 PIPING SUPPORTS	611	31	92	VISUAL VT-3	N-491 CR-12
	F1.30	CLASS 3 PIPING SUPPORTS	497	17	50	VISUAL VT-3	N-491 CR-12
	F1.40	SUPPORTS OTHER THAN PIPING SUPPORTS (CLASS 1, 2, 3, AND MC)	74	25	74	VISUAL VT-3	N-491 CR-12

SECTION 7

UNIT 2 COMPONENT SUPPORT INSPECTION SUMMARY TABLE

UNIT 2
 COMPONENT SUPPORT TABLE
 INSPECTION SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	DESCRIPTION	NUMBER OF NON-EXEMPT COMPONENTS	APPROX. NO. OF COMPONENTS TO BE INSPECTED EACH PERIOD	TOTAL NO. OF COMPONENTS TO BE INSPECTED THIS INTERVAL	EXAMINATION REQUIREMENTS	RELIEF REQUESTS/ CODE CASE
F-A	FI.10	CLASS 1 PIPING SUPPORTS	418	35	105	VISUAL VT-3	N-491 CR-12
	FI.20	CLASS 2 PIPING SUPPORTS	596	30	90	VISUAL VT-3	N-491 CR-12
	FI.30	CLASS 3 PIPING SUPPORTS	382	13	39	VISUAL VT-3	N-491 CR-12
	FI.40	SUPPORTS OTHER THAN PIPING SUPPORTS (CLASS 1, 2, 3, AND MC)	85	29	85	VISUAL VT-3	N-491 CR-12

SECTION 8
ISI COMPONENT RELIEF REQUESTS

SECTION 8 - RELIEF REQUESTS

**ISI COMPONENT RELIEF REQUEST
 INDEX/SUMMARIES**

RELIEF REQ. #	PAGE(S)	REV.	DATE	SUMMARY
CR-01	8-4 thru 8-8	0	10-17-94	Inaccessible welds located at containment penetration assemblies
CR-02	8-9 thru 8-11	0	10-17-94	Inaccessible branch pipe connections located under reinforced saddle
CR-03	8-12		10-17-94	DELETED
CR-04	8-13 thru 8-14	0	10-17-94	Expansion criteria for welds governed by Generic Letter 88-01 and NUREG-0313
CR-05	8-15 thru 8-16	0	10-17-94	Exemption from Appendix VII ultrasonic examination personnel qualification requirements
CR-06	8-17 thru 8-18	0	10-17-94	Use of alternative examination requirements, examination method, and acceptance standard for the reactor vessel closure head nuts
CR-07	8-19 thru 8-21	0	10-17-94	Reactor vessel closure stud examination requirements
CR-08	8-22 thru 8-23	0	10-17-94	Exemption of piping, valves, and fittings 1" NPS and smaller and their associated supports from the requirements of Article IWA-4000
CR-09	8-24 thru 8-25	0	10-17-94	Examination of Head Spray, Head Vent, and Spare Nozzle Inner Radii
CR-10	8-26 thru 8-27	0	10-17-94	Examination of piping welds partially accessible

RELIEF REQ. #	PAGE(S)	REV.	DATE	SUMMARY
CR-11	8-28 thru 8-29	0	10-17-94	Use of Technical Specifications for visual examination of Code Class Snubbers
CR-12	8-30 thru 8-31	0	10-17-94	Examination of component supports located in the Suppression Pool
CR-13	8-32		10-17-94	DELETED
CR-14	8-33 thru 8-34	0	10-17-94	Examination of Reactor Vessel Skirt to Reactor Vessel Bottom Weld
CR-15	8-35 thru 8-37	0	10-17-94	Examination of Longitudinal Welds in Piping
CR-16	8-38 thru 8-39	0	10-17-94	Examination of CRD Housing Bolting

RELIEF REQUEST CR-01
(Page 1 of 5)

COMPONENT IDENTIFICATION

Code Class: 1 and 2
References: IWB-2500, IWC-2500
Table IWB-2500-1, IWC-2500-1
Examination Categories: B-J, C-F-2
Item Numbers: B9.11, B9.12, C5.51, C5.52
Description: Inaccessible Welds Located at Containment Penetration
Assemblies
Component Numbers: See Table CR-01.1

CODE REQUIREMENT

IWB-2500 and IWC-2500 state that components shall be examined and tested as specified in Table IWB-2500-1 and IWC-2500-1, respectively.

Table IWB-2500-1 requires volumetric and surface examination to be performed on circumferential and longitudinal welds 4" NPS and larger, and surface examination to be performed on circumferential welds less than 4" NPS.

Table IWC-2500-1 requires volumetric and surface examination to be performed on circumferential and longitudinal welds on piping that has nominal wall thickness greater than or equal to $\frac{3}{8}$ " and diameter greater than or equal to 4" NPS.

BASIS FOR RELIEF

Each of the lines identified in Table CR-01.1 penetrates the primary containment, secondary containment, or wall by means of a penetration assembly similar in design to those shown in Figure CR-01.1 or CR-01.2. These lines, due to the design of the penetration assembly, have one circumferential pressure retaining weld that is inaccessible for surface and volumetric examination.

As stated in 10 CFR 50.55a(g)(4), throughout the service life of a boiling or pressurized water-cooled nuclear facility, ASME Class 1, 2, and 3 components must meet the requirements set forth in the applicable ASME Section XI to the extent practical within the limitations of design, geometry and materials of construction of the components.

RELIEF REQUEST CR-01
(Page 2 of 5)

Figure CR-01.1 and CR-01.2 clearly illustrate the design constraints which make the subject welds inaccessible for examination by surface or volumetric examination technique.

Based on the above reasons, LaSalle Station requests relief from the ASME Section XI requirements for surface and volumetric examination of the subject welds.

PROPOSED ALTERNATE EXAMINATION

As an alternate examination, LaSalle Station will perform a VT-2 examination of the annular area of each of the subject penetration assemblies in conjunction with the Class 1 or Class 2 pressure tests, whichever is applicable.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

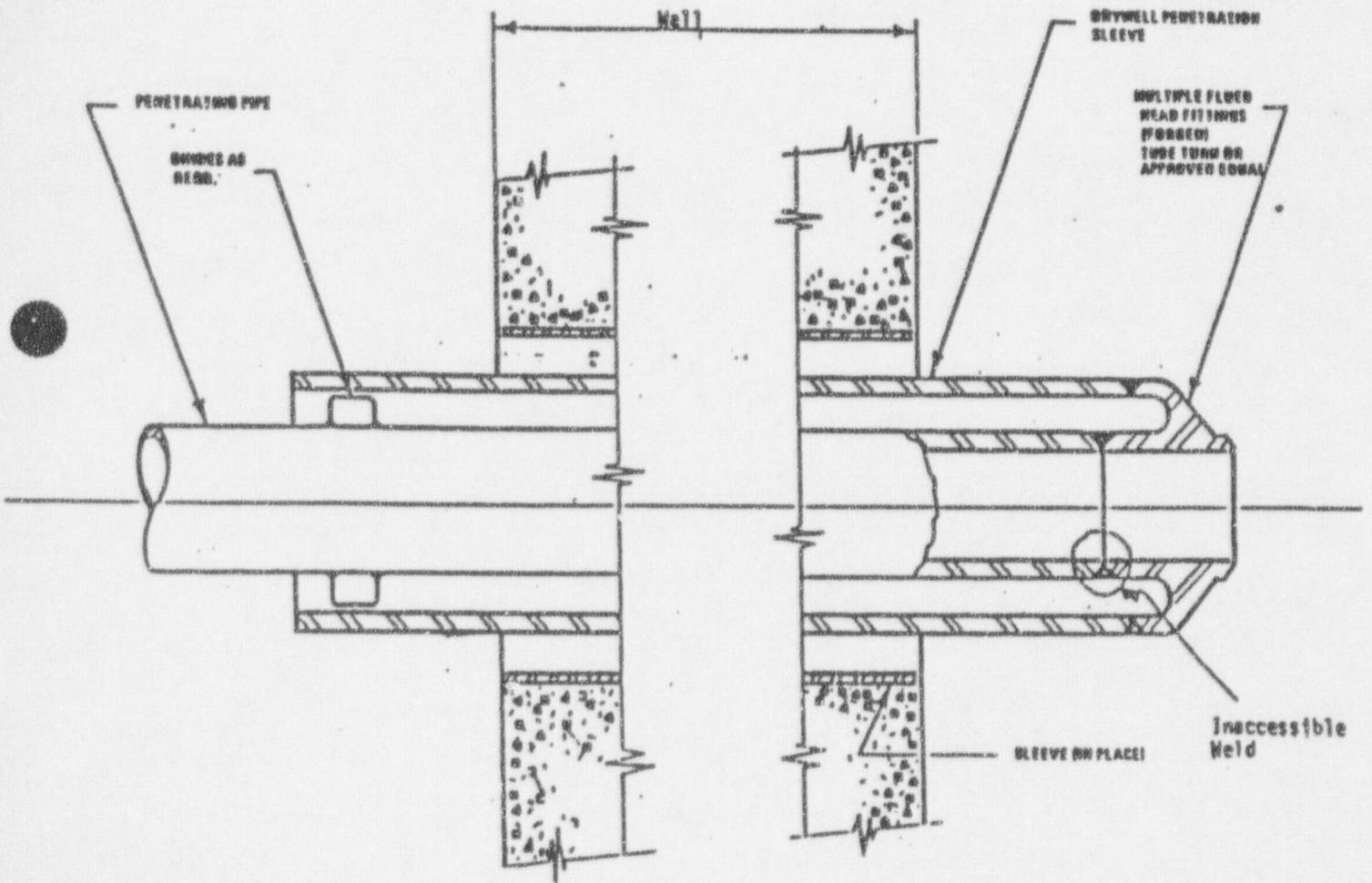
RELIEF REQUEST CR-01
(Page 3 of 5)

TABLE CR-01.1
INACCESSIBLE CONTAINMENT PENETRATION WELDS

SYSTEM	CLASS	LINE NUMBER	PENETRATION	FIGURE
Main Steam	1	1/2MS01EA-26"	M-1	CR-01.1
Main Steam	1	1/2MS01EB-26"	M-2	CR-01.1
Main Steam	1	1/2MS01EC-26"	M-3	CR-01.1
Main Steam	1	1/2MS01ED-26"	M-4	CR-01.1
Main Steam	2	1/2MS01BA-26"	N/A	CR-01.1
Main Steam	2	1/2MS01BB-26"	N/A	CR-01.1
Main Steam	2	1/2MS01BC-26"	N/A	CR-01.1
Main Steam	2	1/2MS01BD-26"	N/A	CR-01.1
Feedwater	1	1/2FW02FA-24"	M-5	CR-01.1
Feedwater	1	1/2FW02FB-24"	M-6	CR-01.1
RCIC (RI)	1	1/2RI01-10"	M-15	CR-01.2

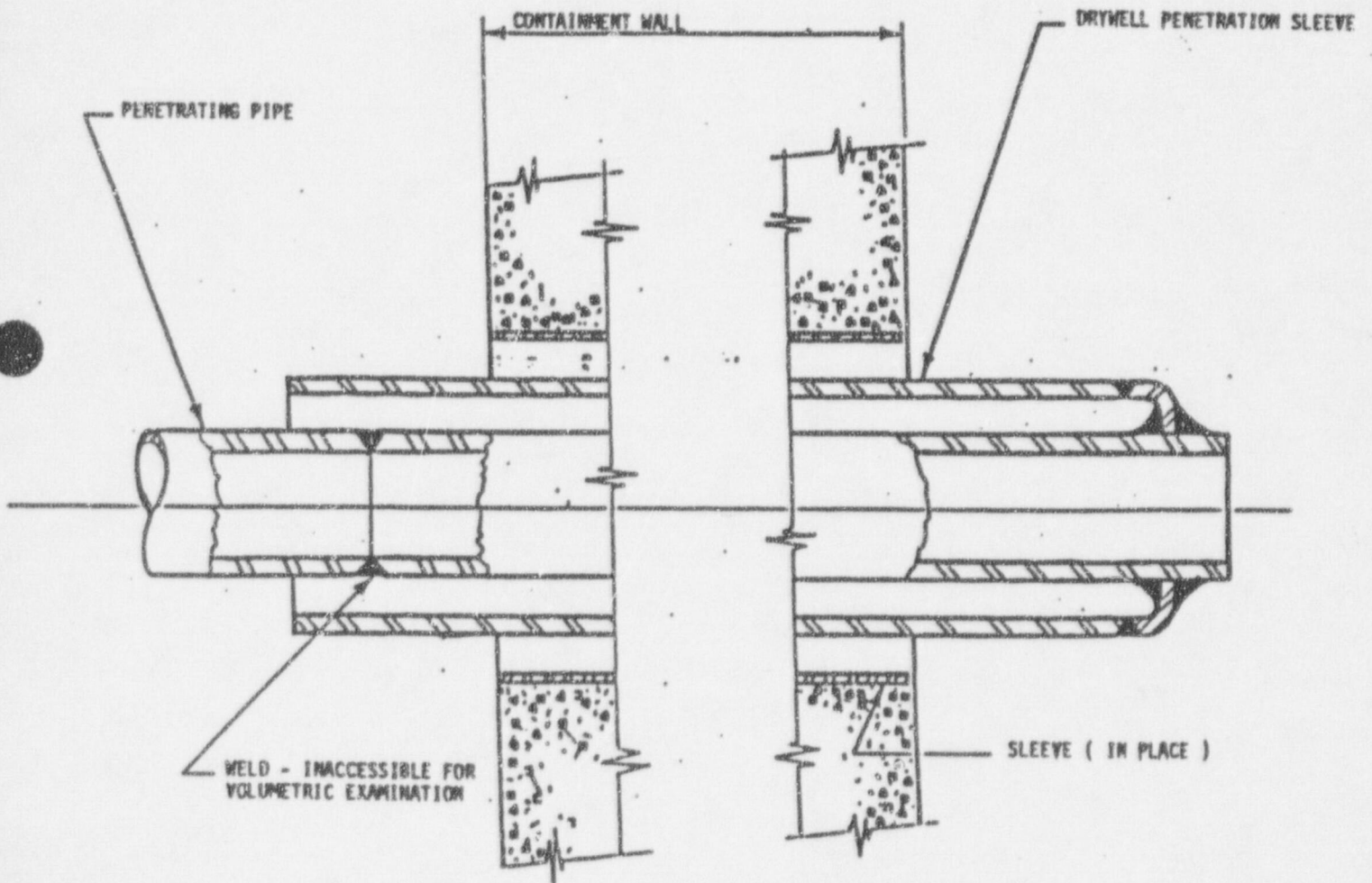
RELIEF REQUEST CR-01
(Page 4 of 5)

FIGURE CR-01.1
CONTAINMENT/WALL PENETRATION



RELIEF REQUEST CR-01
(Page 5 of 5)

FIGURE CR-01.2
CONTAINMENT/WALL PENETRATION



RELIEF REQUEST CR-02
(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class: 2
References: IWC-2500
Table IWC-2500-1
Examination Category: C-F-2
Item Numbers: C5.81, C5.82
Description: Branch Connection We'ds Designed with
Reinforcing Plates
Component Numbers: Class 2 Main Steam Header Branch Connection
Welds

CODE REQUIREMENT

IWC-2500 states that components shall be examined and tested as specified in Table IWC-2500-1.

Table IWC-2500-1 requires surface examination to be performed on branch pipe connection welds greater than 4" NPS.

BASIS FOR RELIEF

The design of ten (10) Class 2 branch pipe connection welds calls for the use of reinforcing saddles. These saddles are fillet welded over the actual pressure retaining branch pipe-to-main pipe weld, completely encasing it as illustrated on Figures CR-02.1. These designs preclude any type of surface or volumetric examination from being performed on the pressure retaining branch connection weld. However, additional assurance of the integrity of these joints is afforded by the fact that the reinforced saddle strengthens the joint and reduces the stresses on the internal weld.

Based on the above reasons, LaSalle Station requests relief from the ASME Section XI requirements for the surface and volumetric examination of Class 2 branch pipe connection welds that are designed with a reinforcing saddle.

PROPOSED ALTERNATE EXAMINATION

As an alternate examination, LaSalle Station will perform a VT-2 examination of these joints in conjunction with the required Class 2 System Pressure Tests.

RELIEF REQUEST CR-02
(Page 2 of 3)

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-02
(Page 3 of 3)

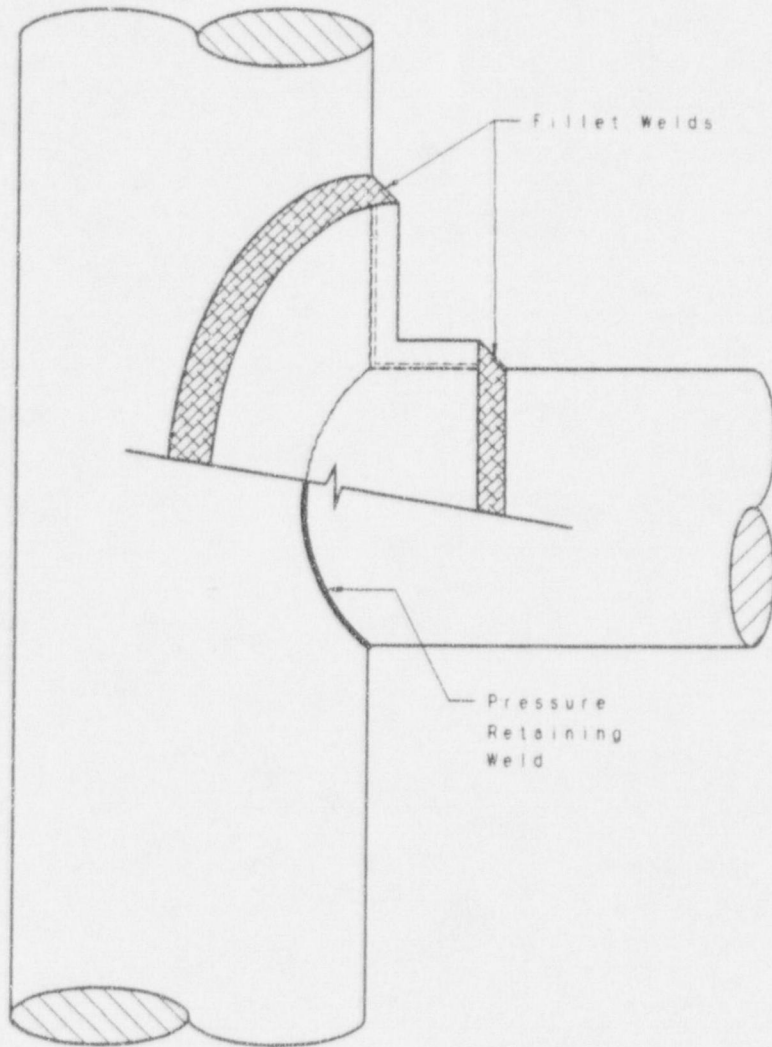


FIGURE CR-02.1
TYPICAL REINFORCED SADDLE

RELIEF REQUEST CR-03
(Page 1 of 1)

RELIEF REQUEST DELETED

RELIEF REQUEST CR-04
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 1
References: IWB-2430
Examination Categories: B-F, B-J
Item Numbers: B5.10, B5.130, B9.11, B9.31
Description: Expansion Criteria for Welds Governed by Generic Letter 88-01 and NUREG-0313, Rev. 2
Component Numbers: All full penetration circumferential and branch pipe connection welds in austenitic stainless steel piping that is 4" NPS or larger and contains reactor coolant at a temperature greater than 200 deg F during power operation

CODE REQUIREMENT

IWB-2430 outlines the additional examinations that must be performed when indications are found that exceed the acceptance standards of IWB-3000.

BASIS FOR RELIEF

Each of the subject welds fall under the augmented inspection program required by Generic Letter 88-01 and NUREG-0313, Rev. 2. This program governs examination methods, examination frequency, and sample expansion. The sample expansion requirements of this program are designed such that additional examinations are limited to welds that have the same susceptibility to Intergranular Stress Corrosion Cracking (IGSCC) as the weld in which the flaw was found. This methodology ensures that welds at a high risk of cracking are examined during the same refueling outage, while not requiring expenditure of the Man-Rem and outage time associated with examining additional low risk welds.

In many instances, the examinations performed to meet the requirements of Generic Letter 88-01 are also applied to the percentages required by ASME Section XI. In these cases it is not practical to apply the expansion criteria of both Generic Letter 88-01/NUREG-0313 and ASME Section XI when unacceptable IGSCC flaw indications are identified.

Based on the above, LaSalle Station requests relief from the ASME Section XI requirements for additional examinations when unacceptable flaw indications are identified in the subject welds.

RELIEF REQUEST CR-04
(Page 2 of 2)

PROPOSED ALTERNATE PROVISIONS

LaSalle Station will perform sample expansions as required by Generic Letter 88-01 and NUREG-0313, Rev. 2 when unacceptable IGSCC flaw indications are identified in the subject welds.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-05
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Classes: 1 and 2
References: IWA-2311(b)
Appendix VII
Examination Categories: B-A, B-D, B-F, B-G-1, B-H, B-J, C-A, C-B, C-F-1, C-F-2
Item Numbers: B1.10 through B1.51
B3.90, B3.100, B5.10, B5.130, B6.20,
B6.30, B6.40, B6.180, B8.10, B9.11,
B9.12, B9.31, C1.10, C1.20, C5.11, C5.12,
C5.51, C5.52
Description: Exemption from Appendix VII Ultrasonic
Examination Personnel Qualification
Requirements.
Component Numbers: All Class 1 and 2 components requiring
ultrasonic examination

CODE REQUIREMENT

IWA-2311(b) requires the training, qualification, and certification of ultrasonic examination personnel to comply with the requirements of Appendix VII, in addition to the requirements of IWA-2300.

Appendix VII addresses requirements for the employers written practice, qualification of ultrasonic examiners, qualification records, and the minimum content of initial training courses for the ultrasonic examination method.

BASIS FOR RELIEF

Appendix VII was first introduced in the 1988 Addenda to Section XI. This appendix represents a dramatic change from the previous Code editions and current industry practices in the requirements for qualification of ultrasonic examination personnel. For instance, new training programs must be developed and taught by trained instructors, employer's written practice must be completely rewritten, new examination question banks must be developed, and specimen banks of at least 15 specimens (with 5 containing actual or simulated flaws) must be developed and purchased.

RELIEF REQUEST CR-05
(Page 2 of 2)

Implementation of Appendix VII will require a massive industry effort. And although the industry is currently working toward compliance with Appendix VII, full implementation is still on going. In fact, since Appendix VII allows for the use of specimens prepared for ultrasonic performance demonstrations per Appendix VIII, many NDE vendors are developing these two programs

simultaneously in order to avoid purchasing of dual specimens.

Based on the above, LaSalle Station requests relief from the ASME Section XI, Appendix VII requirements for the qualification of nondestructive examination personnel for ultrasonic examination.

PROPOSED ALTERNATE PROVISIONS

LaSalle Station will utilize ultrasonic examination personnel qualified in accordance with the requirements of IWA-2300, with the exception of IWA-2311(b). Additionally, personnel utilized to perform ultrasonic examinations on IGSCC susceptible welds will be qualified in accordance with the latest EPRI guidelines.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Station Units 1 and 2.

RELIEF REQUEST CR-06
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 1
References: IWB-2500
Table IWB-2500-1
Examination Category: B-G-1
Item Number: B6.10
Description: Use of Alternative Examination
Requirements, Examination Method, and
Acceptance Standard for the Reactor
Vessel Closure Head Nuts

CODE REQUIREMENT

IWB-2500 states that components shall be examined and tested as specified in Table IWB-2500-1.

Table IWB-2500-1 requires a surface examination to be performed on reactor vessel closure head nuts.

BASIS FOR RELIEF

Table IWB-2500-1 of the 1989 Edition of ASME Section XI requires a surface examination to be performed on the reactor vessel closure head nuts. However, Table IWB-2500-1 does not provide the corresponding "Examination Requirements/Figure Number" and "Acceptance Standard". These provisions were still in the course of preparation.

The incomplete set of rules for the examination of reactor vessel closure head nuts does not allow LaSalle Station to implement an inspection program to verify the integrity of this pressure retaining bolting.

The 1989 Edition of ASME Section XI, Category B-G-1, requires a VT-1 examination for closure nuts associated with heat exchangers, piping, pumps, and valves (item numbers B6.140, B6.170, B6.200, and B6.230, respectively). These Category B-G-1 requirements also provide an acceptance standard, IWB-3517, for the VT-1 examinations. Accordingly, these rules are deemed by LaSalle Station as an acceptable and complete to assure the integrity of the reactor vessel closure nuts.

Based on the above, LaSalle Station requests relief from the requirements specified in Table IWB-2500-1 of the 1989 Edition of ASME Section XI for reactor vessel closure head nuts.

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(Page 2 of 2)**

PROPOSED ALTERNATE POSITIONS

As an alternate examination, LaSalle Station will perform a VT-1 examination of the surface of all reactor closure head nuts, utilizing the acceptance criteria of IWB-3517, as delineated in the 1989 Edition of ASME Section XI.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-07
(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class: 1
References: Table IWB-2500-1
IWB-2430
Examination Category: B-G-1
Item Number: B6.20 (In Place)
B6.30 (When Removed)
Description: Reactor Pressure Vessel (RPV) Closure
Stud Examination Requirements

CODE REQUIREMENT

Table IWB-2500-1 requires a volumetric examination of reactor vessel closure studs if left in place, or a surface and volumetric examination of reactor vessel closure head studs when removed from the flange. Removal is not a requirement at any time.

IWB-2430 requires additional examinations to be performed during the current outage if examinations performed in accordance with Table IWB-2500-1 reveal indications exceeding the acceptance standards of Table IWB-3410-1. If indications exceeding the acceptance standards of Table IWB-3410-1 are found as a result of the additional examinations, IWB-2430 requires examinations to be further extended in the current outage to include "the remaining number of similar components ... within the same category ..."

BASIS FOR RELIEF

Commonwealth Edison Company (CECo) discovered extensive stress corrosion cracking (SCC) in two reactor vessel closure studs at Dresden Unit 2 in late 1988. CECo is pursuing a proactive program of enhanced stud inspections, which exceeds the requirements of Section XI and the recommendations of General Electric Nuclear Energy (GE) Rapid Information Communication Services Information Letter (RICSIL) 055, Revision 1, "Reactor Pressure Vessel Head Stud Cracking," dated September 30, 1991. The CECo program is also intended to include some of the additional recommendations of Regulatory Guide 1.65.

GE RICSIL 055 recommends that enhanced end shot ultrasonic testing (UT) be performed on "at least five RPV head studs either during the next refueling outage or at the next available opportunity." However, for the second ten-year interval LaSalle Station plans to perform the enhanced end shot UT on all RPV closure head studs (68 in Unit 1, 76 in Unit 2). The enhanced end shot UT technique developed by CECo utilizes a 3/4" to 1" diameter transducer with a frequency of

RELIEF REQUEST CR-07
(Page 2 of 3)

3.5 MHz or 5 MHz; the sensitivity of the examination is maximized by setting the background noise level at about 5% full screen height. This technique reliably detects a 0.3" deep saw cut notch from the top end of a RPV head stud. Any indications found with the enhanced end shot UT technique will be sized with a bore probe. The bore probe UT technique developed by CECO reliably detects a 0.1" deep saw cut notch.

At each refueling outage LaSalle Station also plans to remove, if practicable, approximately 1/6 of the total number of RPV studs (i.e. 12 in Unit 1, 13 in Unit 2) from the RPV flange for a wet fluorescent magnetic particle testing (MT). Studs that are normally removed each outage to allow for the installation of the "Cattle Chute" will be excluded from the sample because they are not exposed to water at the end of a refueling outage.

There are several reasons for removing a sample of studs during the second ten-year interval for surface examination:

To provide data on incipient of stud cracking.

To allow for additional metallurgical evaluation of cracking mechanisms and potential embrittlement phenomena, if cracked studs are found and replaced.

To provide a correlation between the enhanced end shot UT, bore probe UT, and MT results, if cracked studs are found.

This information is necessary to make informed decisions on long-term inspection/replacement strategies.

Code structural margins will be assured through the enhanced end shot UT of all studs, and bore probe UT sizing of all cracked studs. Enhanced end shot UT and bore probe UT results will be evaluated in accordance with "Fracture Mechanics Based Structural Margin evaluation for Commonwealth Edison BWR Reactor Pressure Vessel Head Studs", GE Nuclear Energy Report GE-NE-523-93-0991, DRF 137-0010, September 1991 [submitted with a M. H. Richter (CECo) letter to T. E. Murley (NRC) dated October 3, 1991]. The GE structural margin evaluation is based on conservative fracture mechanics methodology and actual fracture toughness testing of material from one of the low-toughness Dresden Unit 2 studs. If the end shot UT is found to be nonconservative, then an expanded sample with more sensitive bore probe UT will be performed. This approach will assure that Code structural margin are maintained without expanding the MT sample.

Results of the enhanced end shot UT, bore probe UT, and MT will be compared in order to benchmark the minimum detection limit of the enhanced end shot UT

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technique. The minimum detection limit of the enhanced end shot UT technique will be judged against a conservative, bounding maximum allowable flaw size (established by the GE structural margin evaluation) which would be acceptable in all studs at the same time. If the minimum flaw detection limit of the enhanced end shot is found to be greater than the maximum allowable flaw size, additional bore probe UT examinations will be performed in lieu of the Section XI required MT sample expansion.

Expanding the MT sample if unacceptable surface indications are found would greatly increase the critical path time and radiation exposure burden during the outage. And, as other utilities have found, it may be impossible to remove the desired sample of studs, without damage, within the constraints of a refueling outage. It is estimated that complete removal of all studs, assuming no stuck studs, would take 8 additional critical path days and expend 7 additional person-rem.

The proposed program is highly proactive, in that Section XI only requires a normal sensitivity end shot UT to be performed in place, and RICSIL 055 only recommends enhanced end shot UT of at least 5 studs. In accordance with Section XI, structural margin would still be assured by the enhanced end shot and bore probe UT. Yet much essential information could be gained by surface examination of a limited sample of studs. For these reasons, CECO requests relief from the MT sample expansion requirements of Section XI IWB-2430.

PROPOSED ALTERNATE EXAMINATION

In lieu of the ASME Section XI requirements for items B6.20 and B6.30, at each refueling outage each RPV closure stud will be examined in place using enhanced end shot UT. Any flaws detected with the enhanced end shot UT will be sized using the bore probe UT. If an MT examination of a sample of studs reveals indications which are found by bore probe UT to exceed the maximum allowable flaw size, and were not detected by the enhanced end shot UT, then sample expansion will proceed using the bore probe UT in lieu of the ASME Section XI required MT sample expansion.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-08
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 1, 2., and 3
References: IWA-4000
IWA-7000
Examination Category: Not Applicable
Item Number: Not Applicable
Description: Exemption of Piping, Valves, and Fittings 1" NPS and Smaller and Their Associated Supports from the Requirements of Article IWA-4000, Repair Procedures.

CODE REQUIREMENT

Repair activities on piping, valves, and fittings 1" NPS and smaller must meet the requirements of Article IWA-4000.

BASIS FOR RELIEF

The rules governing the Repair Procedures, IWA-4000, allow repairs to be performed in accordance with the Owners Design Specifications (ODS) and the Original Construction Code (OCC) in lieu of the rules of Section XI as detailed in IWA-4120.

When repairs are performed on ASME Section XI Class 1, 2, and 3 components in accordance with the ODS/OCC, the requirements of IWA-4130, Repair Program; IWA-4140, Inspection; IWA-4600, Preservice Examination; IWA-4700, Pressure Test; and IWA-4800, Records, remain applicable. At LaSalle Station, the repairs performed to rules of the ODS/OCC and associated procedures are subject to equivalent requirements as the rules of paragraphs IWA-4200, Material; IWA-4300, Defect Removal; IWA-4400, Welding and Welder Qualifications; and IWA-4500, Repair Welding.

Repairs performed on ASME Section XI Class 1, 2, and 3 components that are 1" NPS and smaller are neither subject to the preservice examination requirements of IWA-4600 (per IWB-2200, IWC-2200, and IWD-2200) nor to the pressure test requirements of IWA-4700.

RELIEF REQUEST CR-08
(Page 2 of 2)

Consequently, if repairs on ASME Section XI Class 1, 2, and 3 components that are 1" NPS or smaller are not subject to the repair procedures of IWA-4000, the only requirements not being addressed are IWA-4130, Repair Program; IWA-4140, Inspection (Authorized Inspection Agency involvement); and IWA-4800, Records. Implementation of the requirements listed in this paragraph only creates an additional administrative burden that does not provide a compensating increase in the level of quality or safety. This is illustrated by the fact that the corresponding ASME Section XI rules for replacement of IWA-7000 allows the Owner to replace the same piping, valves, fittings, and associated supports (i.e. 1" NPS and smaller) without being subject to similar ASME Section XI requirements.

Based on the above reasons, LaSalle Station requests relief from the requirements of IWA-4000 when performing repair activities on 1" NPS and smaller piping, valves, fittings, and associated supports.

PROPOSED ALTERNATE EXAMINATION

LaSalle Station will perform and document repairs on 1" NPS and smaller piping, valves, fittings, and associated supports in accordance with the Commonwealth Edison Company Quality Assurance Program, which implements the criteria of 10CFR50, Appendix B, applicable Design Specifications and Construction Codes.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-09
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 1
References: IWB-2500
Table IWB-2500-1
Examination Category: B-D
Item Number: B3.100
Description: Examination of Head Spray, Head Vent, and Spare
Nozzle Inner Radii
Component Numbers: N7, N8, and N18

CODE REQUIREMENT

IWB-2500 states that components shall be examined and pressure tested as specified in Table IWB-2500-1.

Table IWB-2500-1 requires a volumetric examination to be performed on the inner radius section of all reactor vessel nozzles each inspection interval.

BASIS FOR RELIEF

The subject nozzles are located on the reactor vessel head. Access to the inner radius section of these nozzles is possible because the reactor vessel head is removed each refueling outage.

Service induced flaws are expected to initiate and grow from the inside surface of the nozzle inner radius section. Therefore, a surface examination performed on the nozzle inner radius section surface is judged to be more sensitive than a volumetric examination performed from the outside surface of the nozzle.

Based on the above, LaSalle Station requests relief from the volumetric examination requirement specified in Table IWB-2500-1 of the 1989 Edition of ASME Section XI for the subject nozzle inner radius sections.

PROPOSED ALTERNATE EXAMINATION

LaSalle Station will perform a surface examination of the nozzle inner radius surface at the same examination frequency specified by Table IWB-2500-1 for Category B-D. The surface examination area will be area "MN" as described in ASME Section XI, Figure IWB-2500-7.

RELIEF REQUEST CR-09
(Page 2 of 2)

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-10
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Classes:	1 and 2
References:	IWB-2500 IWC-2500 Table IWB-2500-1 Table IWC-2500-1
Examination Categories:	B-J, C-F-1, and C-F-2
Item Numbers:	B9.11, B9.12, B9.21, B9.22, B9.31, B9.32 C5.11, C5.12, C5.21, C5.22, C5.51, C5.52, C5.61, C5.62, C5.81, C5.82
Description:	Examination of Various Piping Welds.
Component Numbers:	Various

CODE REQUIREMENT

IWB-2500 states that components shall be examined and pressure tested as specified in Table IWB-2500-1.

Table IWB-2500-1 requires surface and volumetric examinations to be performed on essentially 100% of each weld requiring examination or 2.5t from the intersecting circumferential weld.

IWC-2500 states that components shall be examined and pressure tested as specified in Table IWC-2500-1.

Table IWC-2500-1 requires surface and volumetric examinations to be performed on 100% of each weld requiring examination or 2.5t from the intersecting circumferential weld.

BASIS FOR RELIEF

Ultrasonic and surface examinations on a number of piping welds in each unit to the extent required by ASME Section XI (i.e. essentially 100% weld length, or at least 90% of examination volume/area per Code Case N-460) are not practical because of the lack of accessibility. The outside surface of these welds and/or adjacent base materials are inaccessible due to the presence of supports, hangers, braces, whip restraints, or wall/floor penetration.

Removal and re-installation of these supports, braces, hangers, or whip restraints to gain access for the required examinations would incur significant radiation exposure to station's personnel.

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(Page 2 of 2)

The adverse impact on margin of safety for not examining these inaccessible welds is judged to be insignificant because (1) the total number of inaccessible welds is small when compared to the total Class 1 or Class 2 welds population, and (2) the inaccessible welds will be substituted by other similar piping welds, to the degree practicable, to maintain the same required initial examination sample size and the first additional examination sample size.

Based on the above reasons, LaSalle Station requests relief from the volumetric and surface examination requirements specified in Table IWB-2500-1 and Table IWC-2500-1 of the 1989 Edition of ASME Section XI for the subject inaccessible piping welds.

PROPOSED ALTERNATE EXAMINATION

LaSalle Station will perform a VT-2 examination of the inaccessible welds that are required to be examined by the rules of Table IWB-2500-1, category B-J, or IWC-2500-1, categories C-F-1 and C-F-2, as part of the walkdown conducted during the Class 1 or 2 pressure test at the end of each refueling outage. Additionally, other similar welds will be substituted, on a 1 for 1 basis to the degree practicable, for the inaccessible welds that are required to be examined by the rules of Table IWB-2500-1, category B-J, or IWC-2500-1, categories C-F-1 and C-F-2.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-11
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 1, 2, 3
Reference: IWF-5200(a)
IWF-5300(a)
Examination Category: Not Applicable
Item Numbers: Not Applicable
Description: ISI Snubbers Included in the Technical Specification
Snubber Visual and Functional Examination Program.

CODE REQUIREMENTS

Preservice examination per IWF-5200(a) and Inservice examination per IWF-5300(a) in accordance with the first addenda to ASME/ANSI OM-1987 Edition, Part 4, published in 1988 (OMa-1988, Part 4, per 10CFR50.55a, paragraph (b)(2)(viii), published August 6, 1992).

BASIS FOR RELIEF

The current LaSalle Technical Specifications (TS) include comprehensive program for visual examination and functional testing of all safety related hydraulic and mechanical snubbers. The safety related snubber population encompasses all Code Class 1, 2, and 3 snubbers.

Of the approximate total of 240 safety related snubbers per unit, approximately 215 are Code Class. The overlap of the visual examination and functional test programs per ASME Section XI and Technical Specifications for Code Class snubbers presents an unnecessary redundancy without a compensating increase in the level of quality and safety.

The TS snubber visual examination program requires a sample size of 100% of all safety related snubbers and incorporates the alternate snubber visual examination delineated in US NRC Generic Letter (GL) 90-09. As determined by the NRC Staff, the alternate schedule of GL 90-09 maintains the same confidence level of quality and safety as the previous TS schedule, which was very similar in content to that of OMa-1988, Part 4.

The GL 90-09 alternate schedule is based on the number of unacceptable snubbers found during the previous examination in proportion to the sizes of the various snubber populations or categories. The alternative examination interval is based on a fuel cycle of up to 24 months and may be as long as two fuel cycles, depending on the number of unacceptable snubbers found during the previous visual examination.

RELIEF REQUEST CR-11
(Page 2 of 2)

The TS snubber functional test program contain the sampling plans described in OMa-1988, Part 4. In the event of a snubber fails to meet the functional test acceptance criteria, the TS required additional testing samples and required corrective actions are equal to or more conservative than those specified in OMa-1988, Part 4.

Based on the reason that the TS snubber visual examination and functional test programs maintain the same or better levels of quality and safety as that of OMa-1988, Part 4, LaSalle Station requests that the TS visual examination and functional test programs for snubbers be used in lieu of the OMa-1988, Part 4 visual examination and functional test programs required by ASME Section XI, Subarticles IWA-5200(a) and IWA-5300(a).

PROPOSED ALTERNATE PROVISIONS

LaSalle Station will perform visual examinations and functional tests of Code Class snubbers in accordance with the snubber examination and test programs contained in the latest approved revision the Technical Specifications in lieu of the OMa-1988, Part 4 visual examination and functional test programs required by Subarticles IWF-5200(a) and IWF-5300(a).

Visual examiners, who are qualified to the applicable rules of ASME Section XI Article IWA-2000, will perform the examinations Code Class snubbers. Visual examination and functional test results of Code Class snubbers will be recorded and reported in accordance with the applicable rules of ASME Section XI Article IWA-6000.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-12
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 2
References: Code Case N-491 IWF-2000
Code Case N-491 Table IWF-2500-1
Code Case N-491 IWF-2430
Examination Categories: F-A
Item Numbers: F1.10 through F1.40
Description: Examination Component Supports
Component Numbers: HPCS, LPCS, MS, RHR, RCIC Class 2
Component Supports In Suppression Pool

CODE REQUIREMENT

IWF-2500 of Code Case N-491 states that component supports shall be examined in accordance with Table IWF-2500-1.

Table IWF-2500-1 of Code Case N-491 requires a VT-3 examination on 15% of Class 2 component supports.

IWF-2430 of Code Case N-491 requires examination on additional component supports when corrective measures in accordance with IWC-3000 is required on component support.

BASIS FOR RELIEF

There are a number of guides and rigid struts on the subject systems that are located in the Suppression Pool. In order to perform a meaningful VT-3 examination in accordance with ASME Section XI on these supports, removal of surface residues would be necessary prior to examination.

The cleaning process would be relatively involved and would present safety and contamination hazards to personnel involved. The Suppression Pool would most likely need to be drained and scaffolding erected for this cleaning process. Therefore, a VT-3 examination on these components is considered to be impractical.

Based on the above reasons, LaSalle Station requests relief from the ASME Section XI/Code Case N-491 requirements for the VT-3 examination of the subject component supports.

RELIEF REQUEST CR-12
(Page 2 of 2)

PROPOSED ALTERNATE EXAMINATION

LaSalle Station will perform a general visual inspection of the Suppression Pool internal structural elements for evidence of apparent changes in proper pipe support orientation. This inspection will not be a VT-3 examination that is defined by ASME Section XI. The general visual inspection will be performed during reactor shutdown prior to each Type A Containment Leak Rate Test, thus exceeding the examination frequency of ASME Section XI/Code Case N-491.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-13
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RELIEF REQUEST DELETED

RELIEF REQUEST CR-14
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class:	1
References:	IWB-2500
Table	IWB-2500-1
Figure	IWB-2500-14
Examination Category:	B-H
Item Numbers:	B8.10
Description:	Examination of Reactor Vessel Support Skirt to Reactor Vessel Bottom Head Weld.
Component Number:	Unit 1: IVS-1 Unit 2: IVS-1

CODE REQUIREMENT

IWB-2500 states that components shall be examined and tested as specified in Table IWB-2500-1.

Table IWB-2500-1 requires a surface examination to be performed on areas A-B and C-D of Figure IWB-2500-13.

BASIS FOR RELIEF

The vessel support skirt is attached to the reactor vessel bottom head by means of a full penetration butt weld. Access to the root area of the weld is limited because of (1) a severe angle between the vessel bottom head and vessel support skirt and (2) close proximity of the control rod drive housings to the inner surface of the vessel support skirt. Therefore, the surface examination requirements of Figure IWB-2500-13 (examination area C-D) cannot be met due to the lack of accessibility.

Based on the above reasons, LaSalle Station requests relief from the ASME Section XI, surface examination requirements of Figure IWB-2500-13, examination area C-D.

RELIEF REQUEST CR-14
(Page 2 of 2)

PROPOSED ALTERNATE EXAMINATION

LaSalle Station will perform a surface examination on the accessible side of the subject weld (examination area A-B).

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-15
(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Classes: 1 and 2
References: IWB-2500
Table IWB-2500-1
Table IWC-2500-1
Examination Category: B-J
C-F-1, C-F-2
Item Numbers: B9.12, B9.22
C5.12, C5.22, C5.42, C5.52, C5.62, C5.82
Description: Examination of Longitudinal Welds in Piping.
Component Number: Various

CODE REQUIREMENT

IWB-2500 states that components shall be examined and pressure tested as specified in Table IWB-2500-1.

Table IWB-2500-1 requires surface and volumetric examinations (piping welds 4" NPS or larger) or surface examination (piping welds less than 4" NPS) of at least a pipe-diameter length but no more than 12" of each longitudinal weld intersecting the circumferential welds.

IWC-2500 states that components shall be examined and pressure tested as specified in Table IWC-2500-1.

Table IWC-2500-1 requires surface and volumetric examinations (piping welds piping welds 2" NPS or larger) or surface examination (pipe branch connections 2" NPS or larger) of 2.5t length from the intersecting circumferential weld.

BASIS FOR RELIEF

At each LaSalle unit, there are approximately 100 Class 1 longitudinal welds and 28 Class 2 longitudinal welds that are subject to surface and volumetric examinations. Examining 100 Class 1 longitudinal welds would incur approximately 140 man-rem per interval, assuming the average exposure rate of 100 mR/hr. Similarly, examination of 28 Class 2 longitudinal welds would incur approximately 5.6 man-rem per interval, assuming the average exposure rate of 20 mR/hr.

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Typically, longitudinal welds are high quality welds. They are typically fabricated under controlled shop conditions and the vast majority underwent heat treatment. Heat treatment of the piping and longitudinal welds enhances the material properties of the welds and reduces the welding residual stresses. Just as fabrication processes are typically better controlled in the shop than in the field, the original shop examinations were also performed under more favorable conditions. This further increases the confidence level for longitudinal welds.

To date, there are no evidence of significant loading conditions or known material degradation mechanisms which specifically relate to longitudinal welds. Longitudinal weld examinations at LaSalle Units 1 and 2 have not detected any defects compromising piping integrity. This experience is further supported by an industry-wide survey that found no evidence of longitudinal weld defects compromising safety at nuclear generating facilities. This survey was conducted recently by the ASME Section XI Task Group on Optimization of ISI.

Ultrasonic and/or surface examinations of longitudinal welds to the extent required by ASME Section XI create radiation and cost burdens without generating significant added safety benefits.

Based on the above reasons, LaSalle Station requests relief from the volumetric and/or surface examination requirements specified in Table IWB-2500-1 and IWC-2500-1 of the 1989 Edition of ASME Section XI for the subject longitudinal welds.

PROPOSED ALTERNATE EXAMINATION

LaSalle Station will perform the following:

1. Surface examination on portions of the longitudinal welds that fall within the examination boundaries of intersecting circumferential welds when only a surface examination is required.
2. Surface and volumetric examinations on portions of the longitudinal welds that fall within the examination boundaries of intersecting circumferential welds when both surface and volumetric examinations are required, provided that:
 - (a) Where longitudinal welds are specified, and locations are known, examination requirements will be met for transverse and parallel flaws at the intersection of the welds and for that length of the longitudinal weld within the circumferential weld examination volume.

RELIEF REQUEST CR-15
(Page 3 of 3)

- (b) Where longitudinal welds are specified, but locations are unknown, or the existence of the longitudinal welds is uncertain, the examination requirements will be met for both transverse and parallel flaws within the entire examination volume of the intersecting circumferential welds.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST CR-16
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 1
References: IWB-2500
Table IWB-2500-1
Examination Categories: B-G-2
Item Numbers: B7.80
Description: Examination of CRD Housings Bolting
Component Numbers: N/A

CODE REQUIREMENT

IWB-2500 states that components shall be examined and pressure tested as specified in Table IWB-2500-1.

Table IWB-2500-1 requires a VT-1 examination to be performed on CRD housing bolting when disassembled.

BASIS FOR RELIEF

During each refuel outage a number of control rod drives are disassembled for maintenance. CRD bolts disassembled during these maintenance activities are either discarded or saved for subsequent refurbishment. New bolts are used when the control rod drives are replaced.

Replacing of CRD bolting is a more conservative approach in assuring the structural integrity of the CRD mechanical connections than reusing bolting that was examined by VT-1 method. This approach removes any possible service induced degradation mechanisms that may exist, therefore, it assures structural integrity of CRD mechanical connection.

New CRD bolts used for replacement are subject to a surface examination in accordance the procurement specification.

For the above reasons, LaSalle Station requests relief from the requirements of ASME Section XI, 1989 Edition, Table IWA-2500-1 for examination of CRD Housing bolting.

RELIEF REQUEST CR-16
(Page 2 of 2)

PROPOSED ALTERNATE EXAMINATION

CRD cap screws at LaSalle Station will be replaced without being subject to a VT-1 examination every time a CRD housing is disassembled and reassembled.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

SECTION 9
UNIT 1 PRESSURE TESTING
SUMMARY TABLE

UNIT 1
 PRESSURE TESTING
 SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
B-P		ALL PRESSURE RETAINING COMPONENTS	VISUAL, VT-2		PR-01 PR-05 PR-06
	B15.10	REACTOR VESSEL		FW	
	B15.11			HP	
				LP	
	B15.50	PIPING		MS	
	B15.51			NB	
				RH	
	B15.60	PUMPS		RI	
	B15.61			RR	
		RT			
		SC			

UNIT 1
 PRESSURE TESTING
 SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
C-P	C7.10	ALL PRESSURE RETAINING COMPONENTS	VISUAL, VT-2	ES	PR-05 PR-06 PR-04 See Note 2
	C7.20	PRESSURE VESSELS		FW	
	C7.30	PIPING		HP	
	C7.40			LP	
	C7.50	PUMPS		MS	
	C7.60			NB	
	C7.70	VALVES		RD	
	C7.80			RH	
				RI	
		RR			
		SC			

UNIT 1
 PRESSURE TESTING
 SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
D-A	D1.10	ALL PRESSURE RETAINING COMPONENTS	VISUAL, VT-2	CSCS	PR-05 PR-06
D-B	D2.10			DG	PR-02 See Note 4 PR-03 See Note 3
D-C	D3.10			FC HP LP MS RH RR	

NOTES:

1. SEE LIST OF CBD'S IN SECTION 2
 FOR DESCRIPTION OF SYSTEM ACRONYMS

2. PR-04 APPLIES TO REACTOR VESSEL
 HEAD FLANGE SEAL LEAK DETECTION
 SYSTEM..

UNIT 1
PRESSURE TESTING
SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
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3. PR-03 APPLIES TO MAIN STEAM
SAFETY RELIEF VALVE DISCHARGE LINES.

4. PR-02 APPLIES TO RH HEAT
EXCHANGER TUBES

SECTION 10
UNIT 2 PRESSURE TESTING
SUMMARY TABLE

UNIT 2
 PRESSURE TESTING
 SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
B-P		ALL PRESSURE RETAINING COMPONENTS			
	B15.10	REACTOR VESSEL		FW	PR-01 PR-05 PR-06
	B15.11			HP	
				LP	
	B15.50	PIPING		MS	
	B15.51			NB	
				RH	
	B15.60	PUMPS	VISUAL, VT-2	RI	
	B15.61			RR	
			RT		
B15.70	VALVES		SC		
B15.71					

UNIT 2
 PRESSURE TESTING
 SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
C-H		ALL PRESSURE RETAINING COMPONENTS	VISUAL, VT-2		PR-05 PR-06 PR-04 See Note 2
	C7.10	PRESSURE VESSELS		ES	
	C7.20			FW	
				HP	
	C7.30	PIPING		LP	
	C7.40			MS	
				NB	
	C7.50	PUMPS		RD	
	C7.60			RH	
		RI			
	C7.70	VALVES	RR		
	C7.80		SC		

UNIT 2
 PRESSURE TESTING
 SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
D-A	D1.10			CSCS	PR-05 PR-06
D-B	D2.10	ALL PRESSURE RETAINING COMPONENTS	VISUAL, VT-2	DG FC HP LP MS RH RR	PR-02 See Note 4 PR-03 See Note 3
D-C	D3.10				

NOTES:

1. SEE LIST OF CBD'S IN SECTION 2
 FOR DESCRIPTION OF SYSTEM ACRONYMS

2. PR-04 APPLIES TO REACTOR VESSEL
 HEAD FLANGE SEAL LEAK DETECTION
 SYSTEM..

UNIT 2
PRESSURE TESTING
SUMMARY TABLE

EXAMINATION CATEGORY	ITEM NUMBER	ITEM NUMBER DESCRIPTION	EXAMINATION REQUIREMENTS	SYSTEM(S)	RELIEF REQUESTS/ CODE CASE
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3. PR-03 APPLIES TO MAIN STEAM
SAFETY RELIEF VALVE DISCHARGE LINES.

4. PR-02 APPLIES TO RH HEAT
EXCHANGER TUBES

SECTION 11
PRESSURE TESTING RELIEF REQUESTS

**SYSTEM PRESSURE TESTING
 RELIEF REQUEST INDEX/SUMMARIES**

RELIEF REQ. #	PAGE(S)	REV.	DATE	SUMMARY
PR-01	1-3 thru 11-4	0	10-17-94	System Leakage Test pressure for the disassembly and reassembly of mechanical joints
PR-02	11-5 thru 11-6	0	10-17-94	Alternate testing for the Residual Heat Removal Heat Exchanger tubes.
PR-03	11-7 thru 11-8	0	10-17-94	Functional and Hydrostatic pressure testing for the Main Steam Safety Relief Valve discharge lines.
PR-04	11-9 thru 11-12	0	10-17-94	Exemption from pressure testing Reactor Vessel Head Flange Seal Leak Detection System.
PR-05	11-13 thru 11-15	0	10-17-94	Use of alternative Rules for the 10 year Hydrostatic testing of Class 1, 2 & 3 Systems.
PR-06	11-16 thru 11-18	0	10-17-94	Use of alternative Rules for Hydrostatic testing requirements, after Repair or Replacement of Class 1, 2 & 3 Components.

RELIEF REQUEST PR-01
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 1
References: IWA-5211(a), IWB-5221(a)
Examination Categories: B-P
Item Numbers: B15.10, B15.71
Description: System Leakage Test Pressure for the Disassembly and Reassembly of Mechanical Connections.
Component Numbers: Various

CODE REQUIREMENT

IWA-5211(a) requires a system leakage test to be conducted following the opening and re-closing of a component in the system after pressurization to nominal operating pressure.

IWB-5221(a) states that the system leakage test shall be conducted at a test pressure not less than the nominal operating pressure associated with 100% rated reactor power.

BASIS FOR RELIEF

The nominal operating pressure associated with 100% rated reactor power is 1,020 psig. Near the end of each refueling outage, a system pressure test of all Class 1 pressure retaining components is conducted at 1,020 psig.

Subsequent to the system pressure test conducted during a refueling outage, or during forced maintenance outages which can occur during an operating cycle, it may become necessary to disassemble and reassemble Class 1 mechanical connections that are located in the drywell and cannot be isolated from the reactor vessel. For these situations, the performance of a Class 1 system leakage test at 1,020 psig would have a significant impact on the unit's critical path outage time and personnel radiation exposure.

The nominal Class 1 system pressure test, which is performed with the vessel flooded up, requires numerous equipment outages (e.g., 380 valves must be taken out-of-service). Performance of the system leakage test, takes approximately 5 days (3 shifts per day) with a total personnel exposure of approximately 2.5 Man-Rem.

RELIEF REQUEST PR-01
(Page 2 of 2)

Performance of a system leakage test during normal startup is possible, however the test cannot be performed at 10,020 psig. During unit startup, the Electro-Hydraulic Control System precludes a reactor pressure above 950 psig without significant increases in reactor power. In order to achieve a pressure of 1,020 psig, the reactor would have to be at approximately 100% rated power. The radiation levels at this power level are prohibitive, and prevent drywell entry by plant personnel.

A drywell entry to inspect for leakage can be performed at greater than, or equal to 920 psig, which is associated with approximately 15% reactor power. Performance of the leakage test in this manner would have an insignificant impact on the ability to detect leakage from a reassembled mechanical connection. It would also significantly reduce the personnel exposure and critical path outage time required for the test.

Based on the above, LaSalle County Station requests relief from the ASME Section XI requirements for the system leakage test pressure when performing pressure testing of reassembled, unisolable Class 1 mechanical connections.

PROPOSED ALTERNATE EXAMINATION

As an alternate examination, LaSalle County Station will perform a system leakage test at greater than, or equal to 920 psig during unit outages when an unisolable Class 1 mechanical connection in the drywell has been disassembled and reassembled either:

- 1) Subsequent to performance of the system pressure test conducted near the end of each refueling outage; or
- 2) During a forced maintenance outage in the course of an operating cycle.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSaile Units 1 and 2.

RELIEF REQUEST PR-02
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 2
References: IWA-5241(b)
Examination Categories: C-H
Item Numbers: C7.10, C7.11
Description: Alternate testing for Residual Heat Removal Heat Exchanger Tubes.
Component Numbers: Unit 1: 1E12-B001A, 1E12-B001B
Unit 2: 2E12-B001A, 2E12-B001B

CODE REQUIREMENT

IWA-5241(b) states that the VT-2 examination of inaccessible components shall consist of an examination of the surrounding area, including floor areas or equipment surfaces located underneath the components, for evidence of leakage.

BASIS FOR RELIEF

The tubing inside the Residual Heat Removal (RHR) Heat Exchanger is inaccessible. A visual examiner cannot enter the RHR Heat Exchanger to perform an examination of the tubes or their surrounding areas during operational or hydrostatic testing of the tube side of the Heat Exchanger.

The shell side of the Heat Exchanger could be pressurized with the tube side drained. Evidence of leakage could then be observed from the shell side to the tube side. However, this requires the removal of the Heat Exchanger Channel Cover flange. Access to the tube side of the vertically mounted Heat Exchanger is from the bottom. The Channel Cover flange weighs approximately 3,500 pounds. Proper alignment of the relatively thin metallic gasket material is difficult to obtain, especially down the center of the Channel Partition Plate. The torquing sequence requires one complete application up to the final torque value while cold, and another complete pass once the Heat Exchanger comes up to normal operating temperature. Past history of this disassembly and reassembly process has proven to cause leaks in this flanged connection that are troublesome to repair while trying to bring the unit back on-line at the end of an outage. As this method can create more leaks than would be found by the inspection, it is considered to create an undo hardship.

Based on the above, LaSalle County Station requests relief from the ASME Section XI requirements for performing a VT-2 examination of the RHR Heat Exchanger tubing during hydrostatic and operational pressure tests.

RELIEF REQUEST PR-02
(Page 2 of 2)

PROPOSED ALTERNATE EXAMINATION

Monitoring of radiation levels in the tube side cooling water will be performed during the shell side pressure test as an alternate method of verifying tube integrity. Radiation levels within Technical Specification limits will be considered acceptable.

When the Heat Exchanger Channel Cover flange is removed for other reasons (i.e. maintenance, repair, or modification work), a VT-2 examination will be performed while the Channel Cover flange is removed and the RHR Heat Exchanger (shell side) is at normal operating pressure. However, the Heat Exchanger Channel Cover flange will not be removed for the sole purpose of performing a VT-2 examination.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST PR-03
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class: 3
References: IWD-5223(f)
Examination Categories: D-B
Item Numbers: D2.10
Description: Exemption From Pressure Testing Piping Beyond the Last Safety or Relief Valve which Discharges into the Suppression Pool.
Component Numbers: Various

CODE REQUIREMENT

ASME Section XI 1989 Edition, IWD-5223(f) states "For safety or relief valve piping which discharges into the containment pressure suppression pool, a pneumatic test (at a pressure of 90% of the pipe submergence head of water) that demonstrates leakage integrity shall be performed in lieu of the system hydrostatic test."

BASIS FOR RELIEF

LaSalle County Station has eighteen Main Steam Relief Valves with associated discharge lines and vacuum breakers. The discharge lines run down through the drywell and discharge into the Suppression Pool.

The provisions of IWD-5223(f) call for a pneumatic test at a test pressure of 90% of the pipe submergence head of water to be performed. The design of the Main Steam Relief Valves and associated discharge piping at LaSalle County Station does not allow for a test to be performed which would demonstrate leakage integrity. No test taps are available on these discharge lines which would allow for the proper pressurization of the system. The pressure associated with 90% submergence head in these discharge lines relates to approximately 3-5 psig, while the design pressure of the lines is 600 psi. At this low test pressure, the vacuum breakers are not designed to provide a leak tight seal and would provide a leak path which would prevent verification of leakage integrity. Imposition of the Code Requirement would present undo hardship and difficulty to LaSalle County Station in that it would require that test taps be provided, a change in the design of the Main Steam Relief Valves, and a change in the design of the vacuum breakers. Per 10CFR50.55a section (g)(4), Code Class components shall meet the requirements of ASME Section XI to the extent practical within the limitations of design, geometry, and materials of construction of the components.

RELIEF REQUEST PR-03
(Page 2 of 2)

Additionally, normal plant operation does not require the actuation and lifting of these relief valves. The valves are only required to operate during accident and transient conditions. The relief valves could be lifted at power, but this practice not only challenges equipment important to safety, but also contributes to degradation of the seating surfaces of the valves leading to leakage and subsequent elevated suppression pool temperatures during the fuel cycle. The lifting of these valves during power operation is considered to present an undue challenge to equipment important to safety, which at the Code Required test pressure of 3-5 psi does not provide a commensurate increase in the level of safety gained by the imposition of the Code Requirement.

Based on the above, LaSalle County Station requests relief from the ASME Section XI requirements for performing a VT-2 under normal operating conditions, and from the hydrostatic test requirements to perform a pneumatic test at 90% of pipe submergence head once each inspection interval.

PROPOSED ALTERNATE EXAMINATION

No alternative examinations are proposed.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST PR-04
(Page 1 of 4)

COMPONENT IDENTIFICATION

Code Class: 2
References: IWC-5210(a)(2)
Table IWC-2500-1
Examination Categories: C-H
Item Numbers: C7.60, C7.80
Description: Exemption From Pressure Testing Reactor Vessel Head
Flange Seal Leak Detection System.
Component Numbers: Various

CODE REQUIREMENT

IWC-5210 (a)(2) requires that the pressure retaining components within each system boundary be subjected to a system hydrostatic pressure test.

BASIS FOR RELIEF

The Reactor Vessel Head Flange Leak Detection Line is separated from the reactor pressure boundary by one passive membrane, a silver plated O-ring located on the vessel flange. A second O-ring is located on the opposite side of the tap in the vessel flange (See Figure PR-04.1). This line is required during plant operation in order to indicate failure of the inner flange seal O-ring. Failure of the O-ring would result in a High Pressure Alarm in the Main Control Room.

The configuration of this system precludes hydrostatic testing while the vessel head is removed. As figure PR-04.1 portrays, the odd configuration of the vessel tap, combined with the small size of the tap and the high test pressure requirement (1000 psig minimum), prevents the tap from being temporarily plugged. Also, when the vessel head is installed, an adequate pressure test cannot be performed due to the fact that the inner O-ring is designed to withstand pressure in one direction only. Resulting from the groove that the O-ring sits in and the pin/wire clip assembly (See Figure PR-04.2), pressurization in the opposite direction could damage the O-ring and thus result in further damage to the O-ring and vessel flange itself from steam cutting.

RELIEF REQUEST PR-04
(Page 2 of 4)

Pressure testing of this line during the Class 1 System Leakage and/or Hydrostatic Test is precluded because the will only be pressurized in the event of a failure of the inner O-ring. Purposely failing the inner O-ring to perform the Code Required test would require purchasing a new set of O-rings, additional time and radiation exposure to detension the reactor vessel head, install the new O-rings, and then reset and retension the reactor vessel head. This is considered to impose an undue hardship and burden on LaSalle County Station.

Based on the above, LaSalle County Station requests relief from the ASME Section XI requirements for static and operational pressure testing of the Reactor Vessel Head Flange Seal Leak Detection System.

PROPOSED ALTERNATE EXAMINATION

A VT-2 examination will be performed on the line during a refueling outage. The hydrostatic head developed with the leak detection line filled with water up to the vessel flange will allow for the detection of any gross indications in the line. This examination will be performed with the frequency specified by Table IWC-2500-1 for an IWC-5221 test (once each inspection period).

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST PR-04
(Page 3 of 4)

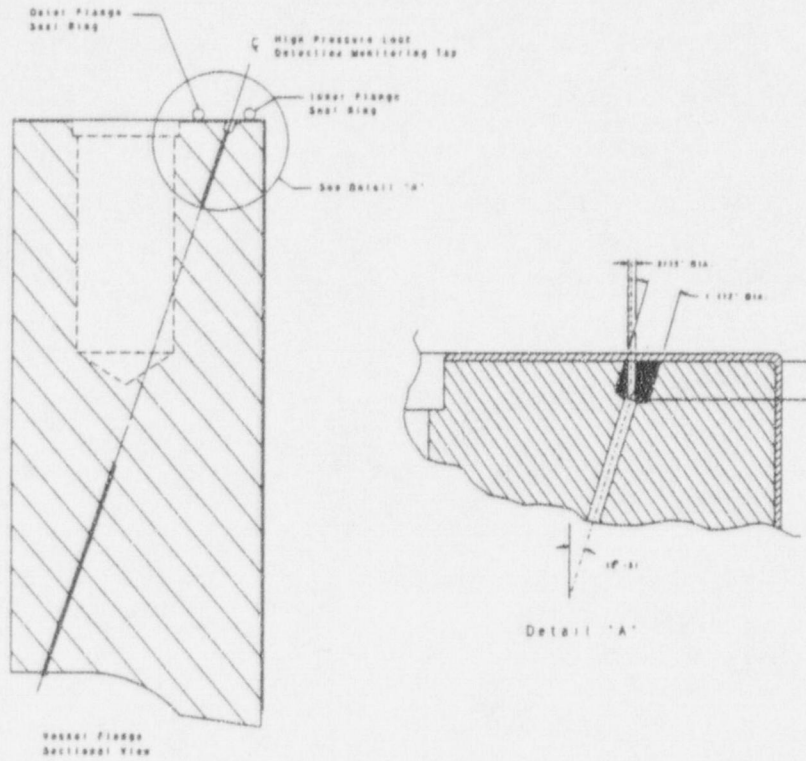
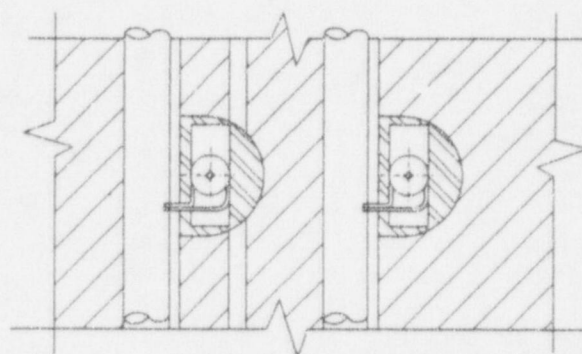
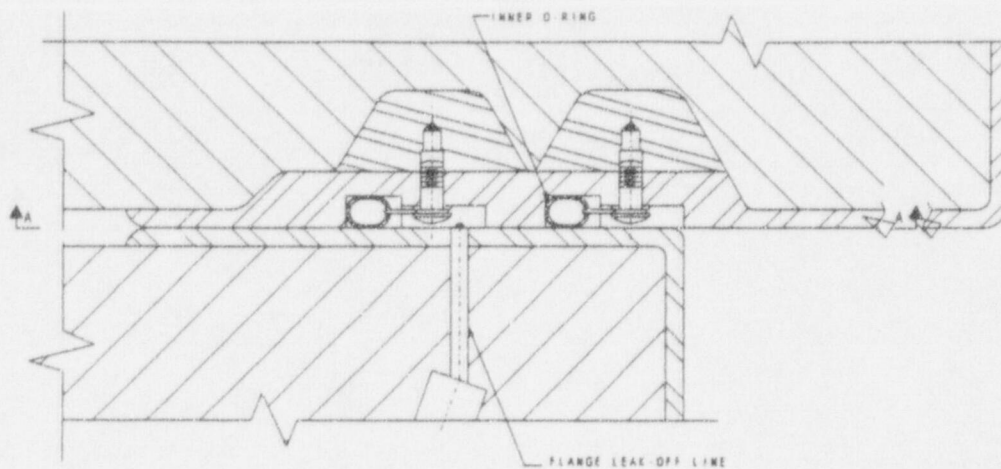


FIGURE PR-04.1

FLANGE SEAL LEAK DETECTION LINE DETAIL

RELIEF REQUEST PR-04
(Page 4 of 4)



SECTION A-A

FIGURE PR-04.2

O-RING CONFIGURATION

RELIEF REQUEST PR-05 (Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class: 1, 2, and 3
References: IWA-5000, IWB-5000, IWC-5000,
IWD-5000, Table IWB-2500-1,
Table IWC-2500-1, Table IWD-2500-1
Examination Categories: B-P, C-H, D-A, D-B, D-C
Item Numbers: B15.ST, C7.ST, D1.10, D2.10, D3.10
Description: Alternate Pressure Testing of Class 1, 2 and 3 Systems in
lieu of the Ten-Year Hydrostatic Pressure Test.
Component Numbers: All Class 1, 2, and 3 pressure retaining components subject
to Hydrostatic Testing per IWA-5000.

CODE REQUIREMENT

ASME Section XI, Tables IWB-2500-1, IWC-2500-1 and IWD-2500-1 require Class 1, 2 and 3 pressure retaining components to be VT-2 examined while the system(s) is subjected to an elevated pressure hydrostatic test at or near the end of each inspection interval.

ASME Section XI, IWB-5222 states the Class 1 system hydrostatic test may be conducted at any test pressure specified in Table IWB-5222-1. The test pressure range is $1.02 \times P_o$ to $1.10 \times P_o$ (where P_o is the nominal operating pressure corresponding with 100% rated reactor power) and is determined as a function of the test temperature. ASME Section XI IWC-5222 and IWD-5223 state that the system hydrostatic test pressure shall be at least 1.10 times the system pressure P_{sv} for systems with a design temperature of 200°F or less, and at least 1.25 times the system pressure P_{sv} for systems with a design temperature above 200°F. The system pressure, P_{sv} , is the lowest pressure setting among the safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For test systems not provided with safety or relief valves, the system design pressure P_d shall be substituted for P_{sv} .

BASIS FOR RELIEF

Hydrostatic tests are difficult to perform and represent a true hardship to LaSalle County Station. Some of the difficulties associated with hydrostatic testing include the following:

- Hydrostatic testing often requires complicated or abnormal valve line-ups in order to properly vent, fill and isolate the system or component(s) being tested.

RELIEF REQUEST PR-05
(Page 2 of 3)

-Relief valves with setpoints lower than the hydrostatic test pressure must be gagged or removed and blind flanged thus deliberately defeating their intended overpressure protection function. In some cases this function is intended to protect equipment important to safety. The gagging, or blinding process also requires the draining and refilling of the system, which increases the radiation exposure burden.

-Valves that are not normally used for isolation (e.g., normally open pump discharge valves) are often required to provide pressure isolation for a hydrostatic test. These valves frequently require time consuming seat maintenance in order to allow for pressurization and isolation.

The difficulties in performing a hydrostatic pressure test are prohibitive when weighed against the benefits. Industry experience, which is corroborated by LaSalle County Station's experience, shows that most through wall leakage is detected during system operation as opposed to during elevated pressure tests such as ten-year hydrostatic tests.

Little benefit is gained from the added challenge to the piping system provided by a hydrostatic test (when compared to an operational test), especially when considering that the piping stress experienced during a hydrostatic test does not include the significant stresses affiliated with thermal growth and dynamic loading associated with design basis events.

LaSalle County Station believes that the imposition of the Code Required hydrostatic testing presents undue hardships which do not provide a commensurate increases in the level of safety which may be gained by performing the Code Requirement.

These arguments are supported by the approval of Code Case N-498-1 on May 11, 1994. This code case permits hydrostatic testing at nominal operating pressure in lieu of the elevated pressures currently required.

Based on the above, LaSalle County Station requests relief from the ASME Section XI requirements for performing the ten-year hydrostatic tests at elevated pressures for Class 1, 2 and 3 systems.

RELIEF REQUEST PR-05
(Page 3 of 3)

PROPOSED ALTERNATE EXAMINATION

A VT-2 examination will be performed during a system hydrostatic test which is conducted using the rules of Code Case N-498-1.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

RELIEF REQUEST PR-06
(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class: 1, 2, and 3
References: IWA-4700(a), IWB-7400, IWC-7200,
IWC-7200, IWA-5214
Examination Categories: B-P, C-H, D-A, D-B, D-C
Item Numbers: B15.ST, C7.ST, D1.10, D2.10, D3.10
Description: Alternative Pressure Test Requirements for Welded Repairs
and Installation of Replacement Items by Welding on Class
1, 2, and 3 Pressure Retaining components.
Component Numbers: All Class 1, 2, and 3 pressure retaining components subject
to Hydrostatic Testing per IWA-4700.

CODE REQUIREMENT

IWA-4700(a) requires a hydrostatic test to be performed after repairs by welding, or the installation of replacement items by welding on the pressure retaining boundary of Class 1, 2, and 3 components, except as exempted by IWA-4700(b).

BASIS FOR RELIEF

Hydrostatic tests are difficult to perform and often represent a true hardship. Some of the difficulties associated with hydrostatic testing include the following:

- Hydrostatic testing often requires complicated or abnormal valve line-ups in order to properly vent, fill and isolate the system or component(s) being tested.
- Relief valves with setpoints lower than the hydrostatic test pressure must be gagged or removed and blind flanged. This process requires the draining and refilling of the system.
- Valves that are not normally used for isolation (e.g., normally open pump discharge valves) are often required to provide pressure isolation for a hydrostatic test. These valves frequently require time consuming seat maintenance in order to allow for pressurization and isolation.

RELIEF REQUEST PR-06
(Page 2 of 3)

-The radiation exposure required to perform a hydrostatic pressure test is high (in comparison to operational pressure testing) due to the large amount of time required to prepare the volume for testing (i.e., installing relief valve gags, performing appropriate valve line-ups, etc.).

The difficulties in performing a hydrostatic pressure test are prohibitive when weighed against the benefits. Industry experience, which is corroborated by LaSalle County Station's experience, shows that most through wall leakage is detected during system operation as opposed to during elevated pressure tests such as ten-year hydrostatic tests.

Little benefit is gained from the added challenge to the piping system provided by a hydrostatic test (when compared to an operational test), especially when considering that the piping stress experienced during a hydrostatic test does not include the significant stresses affiliated with thermal growth and dynamic loading associated with design basis events.

The acceptability of performing nominal operating pressure tests in lieu of hydrostatic tests is also supported by the recent approval by the Board of Nuclear Codes and Standards (BCNS) of Code Case N-416-1, "Alternative Pressure Test Requirements for Welded Repairs or Installation of Replacement Items by Welding", for Class 1, 2, and 3 Systems, ASME Section XI, Division 1. This Code Case allows a system pressure test at nominal operating pressure and temperature (in accordance with IWA-5000 of the 1992 Edition of ASME Section XI) to be used in lieu of a hydrostatic test, provided that NDE of the weld(s) is performed in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of ASME Section III.

Based on the above, LaSalle County Station requests relief from the ASME Section XI requirements for performing hydrostatic tests after repairs by welding, or the installation of replacement items by welding, on the pressure retaining boundary of Class 1, 2, and 3 components.

PROPOSED ALTERNATE EXAMINATION

As an alternate to the existing ASME Section XI requirements, LaSalle County Station will adopt the provisions of Code Case N-416-1 along with the following additional NDE requirements when performing repairs by welding or installing replacement items by welding on the pressure retaining

**RELIEF REQUEST PR-06
(Page 3 of 3)**

boundary of Class 3 components, NDE shall be performed in accordance with the methods and acceptance criteria of Subsection ND of the 1992 Edition of ASME Section III. In addition, when the surface examination method is used in accordance with ND-5222 for a butt weld, an additional surface examination shall be performed on the root (pass) layer.

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2.

SECTION 12
CODE CASES

SECTION 12 - CODE CASES

- 1.0 The following ASME Section XI, Division 1, Code Cases are listed in paragraph C., REGULATORY POSITION, of Regulatory Guide 1.147, INSERVICE INSPECTION CODE CASE ACCEPTABILITY ASME SECTION XI, DIVISION 1, as being acceptable to the NRC staff for implementation in the inservice inspection of components and supports, within any limitations stated in this Reg. Guide or the individual Code Case. The Code Cases listed are only those that apply, or may apply, to LCNS. LCNS may not currently utilize all of the Code Cases listed here, but reserves the right to use any of these Code Cases when applicable.
- 1.1 N-98 Calibration Block Tolerances.
 - 1.2 N-211 Recalibration of Ultrasonic Equipment Upon Change of Personnel.
 - 1.3 N-235 Ultrasonic Calibration Checks per Section V.
 - 1.4 N-236-1 Repair and Replacement of Class MC Vessels.
 - 1.5 N-278 Alternative Ultrasonic Calibration Block Configuration I-3131 and T-434.3
 - 1.6 N-307-1 Revised Ultrasonic Examination Volume for Class 1 Bolting, Table IWB-2500-1, Examination Category B-G-1, When the Examinations Are Conducted From the Center Drilled Hole.
 - 1.7 N-335-1 Rules for Ultrasonic Examination of Similar and Dissimilar Metal Piping Welds.
 - 1.8 N-408-2 Alternative Rules for Examination of Class 2 Piping.
 - 1.9 N-409-2 Procedure and Personnel Qualification Requirements for Ultrasonic Detection and Sizing of Intergranular Stress Corrosion Cracking in Austenitic Piping Welds.
 - 1.10 N-415 Alternative Rules for Testing Pressure Relief Devices.
 - 1.11 N-416 Alternative Rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping.
 - 1.12 N-419 Extent of VT-1 Examinations, Category B-G-1 of Table IWB-2500-1.

- 1.13 N-426 Extent of VT-1 Examinations, Category B-G-2 of Table IWB-2500-1.
- 1.14 N-427 Code Cases and Inspection Plans
- 1.15 N-429-1 Alternative Rules for Ultrasonic Instrument Calibration.
- 1.16 N-432 Repair Welding Using Automatic or Machine Gas Tungsten-Arc Welding (GTAW) Temperbead Technique.
- 1.17 N-435-1 Alternative Examination Requirements for Vessels With Wall Thickness 2 in. or Less.
- 1.18 N-437 Use of Digital Readout and Digital Measurement Devices for Performing Pressure Tests.
- 1.19 N-457 Qualification Specimen Notch Location for Ultrasonic Examination of Bolts and Studs.
- 1.20 N-458 Magnetic Particle Examination of Coated Materials.
- 1.21 N-460 Alternative Examination Coverage for Class 1 and Class 2 Welds.
- 1.21 N-461 Alternative Rules for Piping Calibration Block Thickness.
- 1.22 N-463-1 Evaluation Procedures and Acceptance Criteria for Flaws in Class 1 Ferritic Piping that Exceed the Acceptance Standards of IWB-3514.2.
- 1.23 N-465 Alternate Rules for Pump Testing.
- 1.24 N-472 Use of Digital Readout and Digital Measurement Devices for Performing Pump Vibration Testing.
- 1.25 N-479-1 Boiling Water Reactor (BWR) Main Steam Hydrostatic Test.
- 1.26 N-481 Alternative Examination Requirements for Cast Austenitic Pump Casings.
- 1.27 N-485-1 Eddy Current Examination of Coated Ferritic Surfaces as an Alternative to Surface Examination.
- 1.28 N-489 Alternative Rules for Level III NDE Qualification Examinations.
- 1.29 N-490-1 Alternative Vision Test Requirements for Nondestructive

Examiners.

- 1.30 N-491 Alternative Rules for Examination of Class 1, 2, 3, and MC Component Supports of Light-Water Cooled Power Plants.
- 1.31 N-494 Pipe Specific Evaluation Procedures and Acceptance Criteria for Flaws in Class 1 Ferritic Piping that Exceed the Acceptance Standards of IWB-3514.2
- 1.32 N-495 Hydrostatic Testing of Relief Valves.
- 1.33 N-496 Helical-coil Threaded Inserts.
- 1.34 N-498 Alternative Rules for 10-Year Hydrostatic Pressure Testing for Class 1 and 2 Systems.

SECTION 13
REFERENCES

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- 1.0 Code of Federal Regulations, Part 10, Paragraph 50.55a, Codes and Standards.
- 2.0 American Society of Mechanical Engineers Boiler and Pressure Vessel Code, Section XI, Division 1, Rules for Inservice Inspection of Nuclear Power Plant Components, 1989 Edition.
- 3.0 Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability ASME Section XI Division 1.
- 4.0 Generic Letter 88-01, NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping.
- 5.0 NUREG-0519, Safety Evaluation Report Related to the Operation of LaSalle County Station Units 1 & 2.
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- 7.0 NUREG-0800, Standard Review Plan for Review of Safety Analysis Reports for Nuclear Power Plants.
- 8.0 I.E. Bulletin 80-13, Examination of High and Low Pressure Core Spray Spargers.
- 9.0 LaSalle County Station Units 1 & 2 Technical Specifications.
- 10.0 LaSalle County Station Final Safety Analysis Report.
- 11.0 LaSalle County Station Updated Final Safety Analysis Report.
- 12.0 Bases Document for LaSalle County Station Units 1 & 2 Second Interval Inservice Inspection Programs.
- 13.0 Piping & Component Support and Integral Attachment Bases Document for LaSalle County Station Units 1 & 2 Second Interval Inservice Inspection Program.
- 14.0 LaSalle County Station P&ID's.
- 15.0 LaSalle County Station Line List.
- 16.0 LaSalle County Station Support List.

- 17.0 LaSalle County Station First Interval ISI Program.
- 18.0 LaSalle County Station Classification Boundary Drawings.