

# JAMES A. FITZPATRICK NUCLEAR POWER PLANT

INSERVICE INSPECTION PROGRAM
RELIEF REQUESTS
for the
2nd TEN-YEAR INTERVAL CLOSEOUT

NEW YORK POWER AUTHORITY James A. FitzPatrick Nuclear Power Plant Docket No. 50-333

9707230082 970715 PDR ADOCK 05000333 Q PDR

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#### **SUMMARY LISTING**

#### Introduction

# Class 1 Components

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Diameter
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#### INTRODUCTION

These Relief Requests are being submitted as part of the close-out for the 2nd Ten-Year Interval which was performed in accordance with the ASME Section XI Code Edition 1980 up to and including Winter Addenda 1981. The requests for relief enclosed are submitted pursuant to 10 CFR 50.55a (a)(3)(i), 10 CFR 50.55a (a)(3)(ii), 10 CFR 50.55a (g)(5)(iii) and/or in accordance with an approved Relief Request as stipulated in a Safety-Evaluation (SE) by the Office of Nuclear Reactor Regulation. The requests, along with their specific regulatory basis, are described in detail along with supporting technical discussion, documentation and referenced SE. Included in the Tables and Enclosures are welds examined during the 2nd Ten-Year Interval (7/85 - 9/97) whose inspections have not met the code required coverage as defined in Code Case N-460, Alternative Examination Coverage for Class 1 and Class 2 Welds, along with sketches and/or drawings that depict the limiting condition. Also included are relief requests for pressure testing which are submitted for pressure tests that were not performed during the 2nd period of the 2nd Ten-Year Interval. There are two requests for relief for (1) ASME Code Category B-K-1, Attachment Welds, Item No. B10.10 and (2) ASME Code Category B-G-1, RPV Flange Ligaments, Item No. B6.40, that do not meet Program B, 3rd period requirements and a resubmittal for relief which supersedes the initial request from the containment inspection rule ASME Section XI, 1992 Edition and Addenda, Subsection IWE/IWL, Repair/Replacement activities.

# **CLASS 1 COMPONENTS**

Code Category B-A:	Pressure Retaining Welds in Reactor Vessel
Item No. B1.20	RPV Bottom Head Welds
Item No. B1.21	Circumferential
Item No. B1.22	Meridional
Item No. B1.21	Circumferential

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of volumetric examination for the following circumferential welds in the Reactor Vessel Bottom Head listed in Table 1. This relief is also submitted in accordance with the NRC's review of 2nd Ten-Year Inservice Inspection Program and Requests for Relief, Dated October 27, 1987, Docket No. 50-333, Relief Request (R14).

#### **Examination Requirements**

ASME Section XI, 1980 Edition through Winter 1981 Addenda, requires 100% volumetric examination of the weld plus ½ of the adjacent base metal on each side of the weld crown.

#### Basis for Relief

Inspections of the Code-required accessible length of one weld was conducted on the RPV Bottom Head Circumferential Welds with limitations based on restricted access. Access to the area is limited to four 18" diameter manways 90° apart in the vessel support skirt. In adddition, the one hundred and thirty-seven (137) control rod drives and forty-three (43) in-core monitor instrumentation penetrations present extensive interference. The positioning and spacing of these components prevent an inspector from physically being able to reach them and allows access to a very limited portion the welds. There is also interference from the vesse, support skirt which is welded to the bottom head on the lower portion of weld VC-BH-1-2. This combined with the curvature of the bottom head and the Bio-shield wall narrowing in this area precludes access. Permanent vessel insulation and limited storage space for those insulation panels which require removal is extremely limited because of the small size of the manways.

## **Proposed Alternative Examinations**

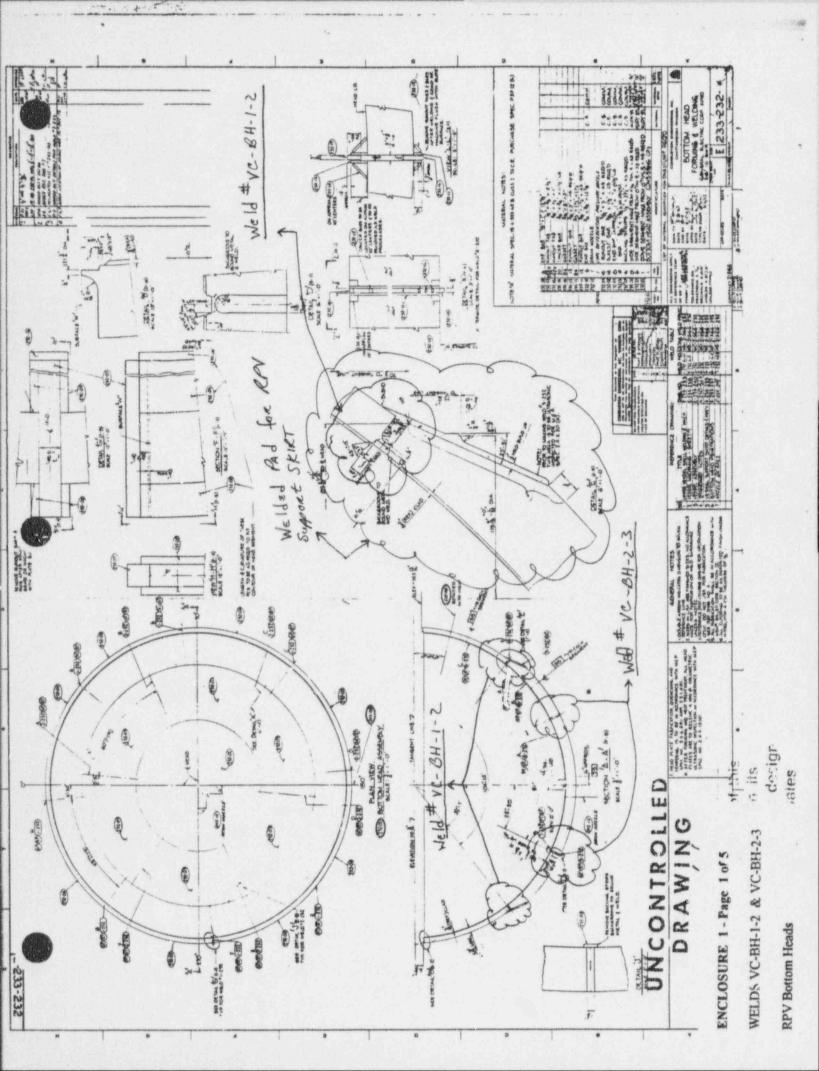
- No additional volumetric examinations will be performed. The RPV welds have been examined to the maximum extent practical from the outside surface.
- A visual examination (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no evidence of leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.

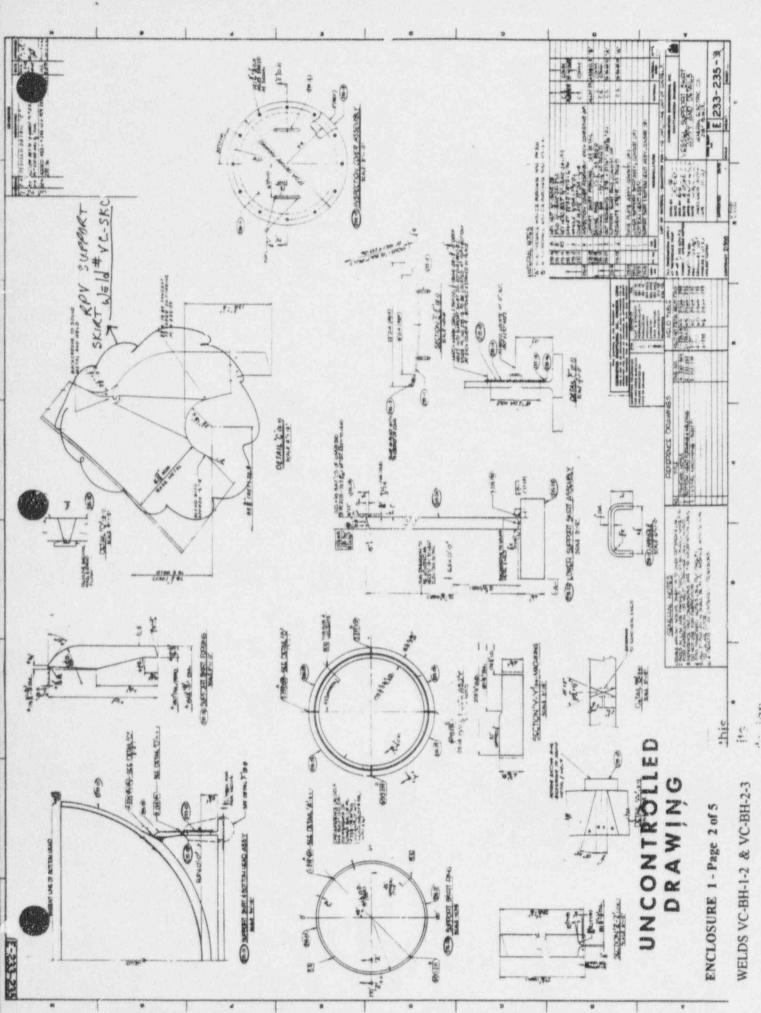
RPV Pressure Retaining Welds addressed by this Relief Request are listed in Table 1. Drawings highlighting component design, configuration of interferences, and limitations associated with the examinations are included in Enclosure 1.

Table 1

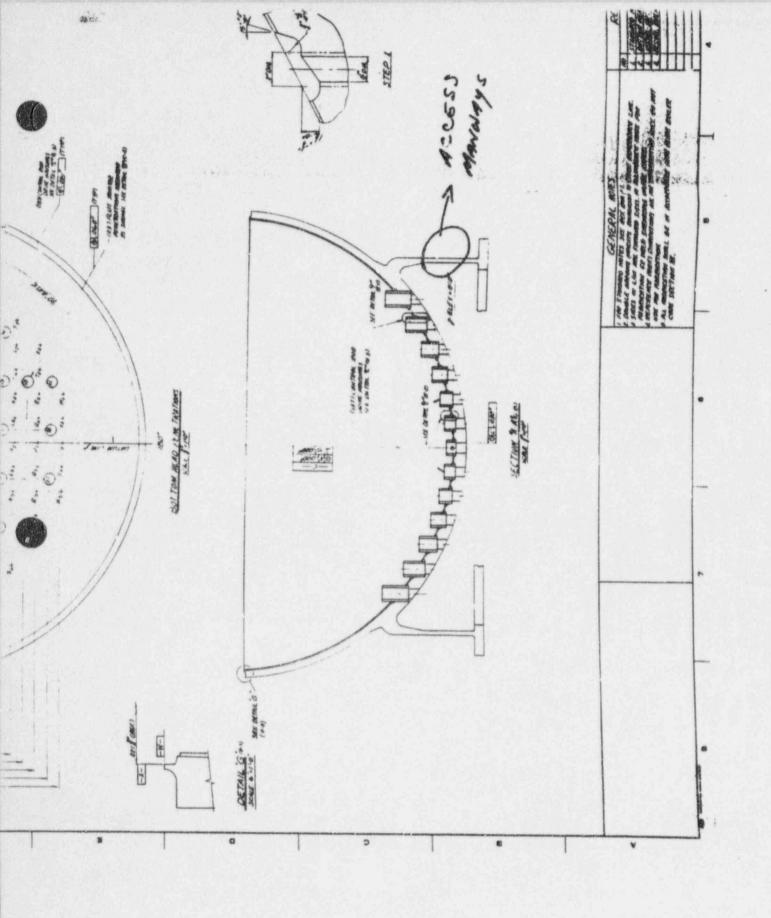
	Code (	ategory B-A / Item No	. B1.21	
Component ID	System	Extent Examined	Limitation	Remarks
VC-BH-1-2	RPV Bottom Head	117"	Restricted Access	
VC-PH-2-3	RPV Bottom Head	None	Inaccessible	The second secon

# **ENCLOSURE 1**

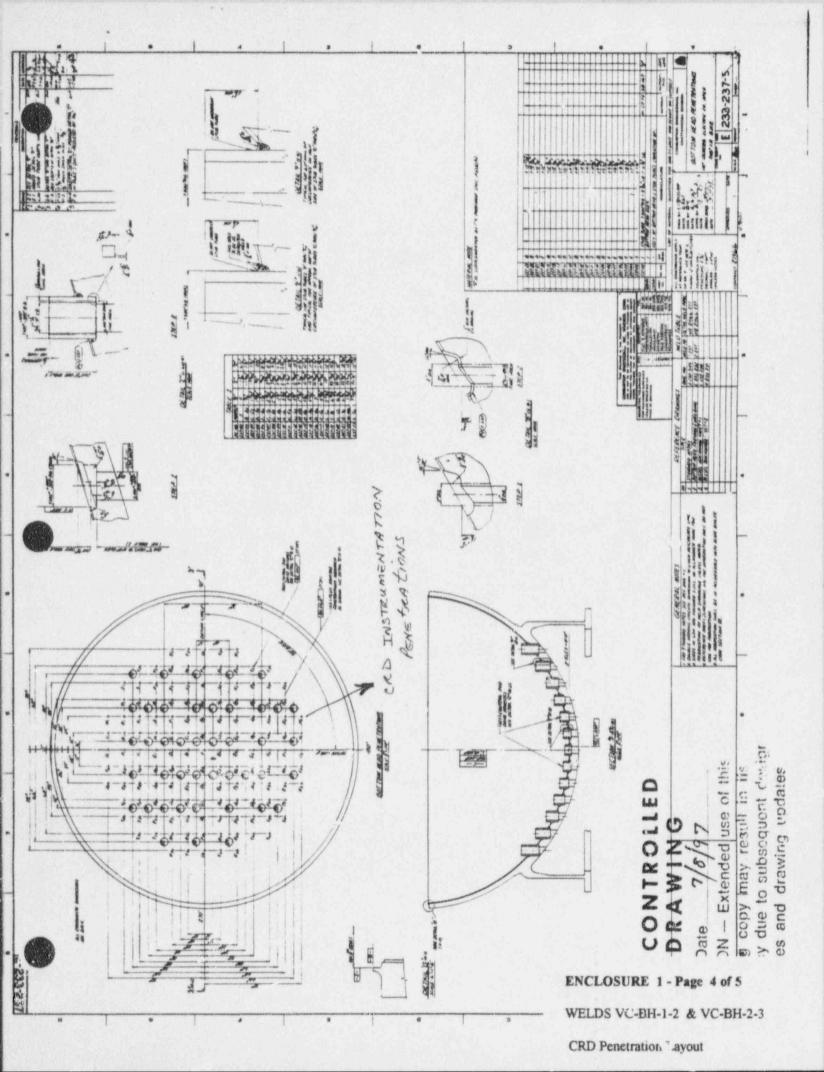


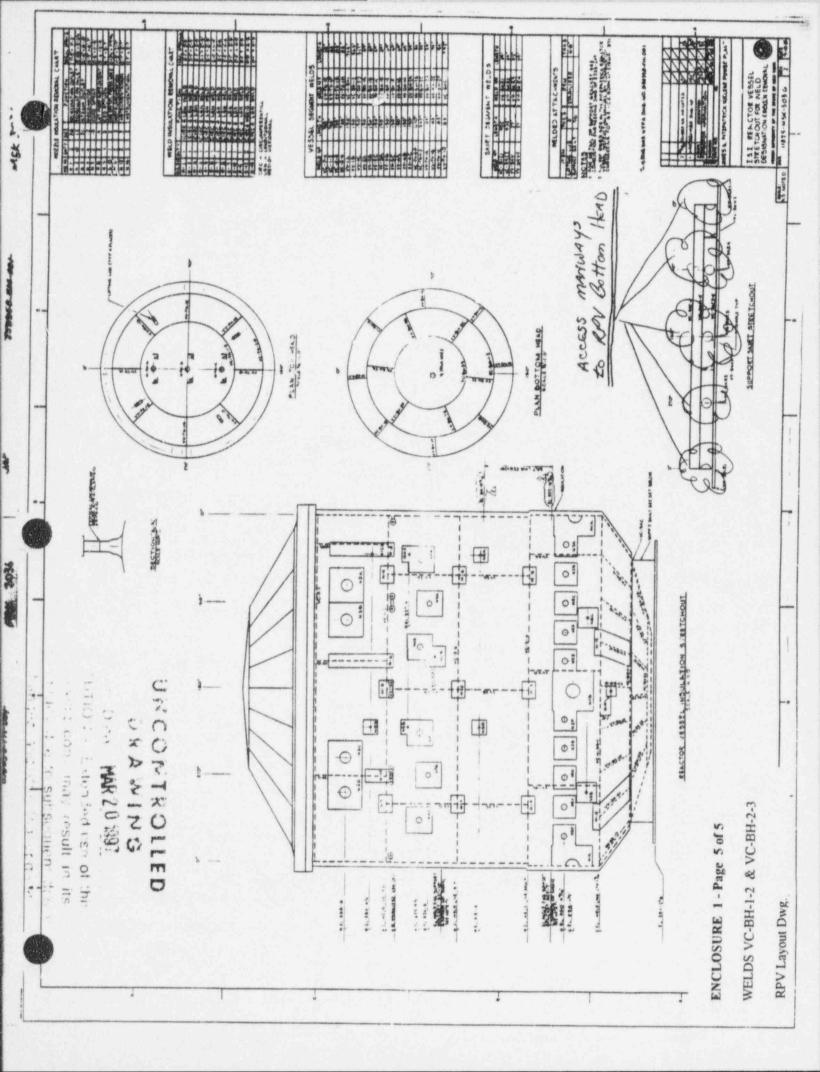


RPV Support Skirt Weld VC-SKC



ENCLOSURE 1 - Page 3 of 5
WELDS VC-BH-1-2 & VC-BH-2-3
RPV Support Skirt Access Manways





# Item No. B1.22 RPV Bottom Head Meridional Welds

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of volumetric examination for the following RPV Bottom Head Meridional Welds listed in Table 1A. This relief is also submitted in accordance with the NRC's Safety Evaluation (SE) of the 2nd Ten-Year Inservice Inspection Program, Dated October 27, 1987, Docket No. 50-333 Relief Request (R14). In accordance with Relief Request (R14) of the 2nd Ten-Year Interval, the Authority is outlining the extent of examinations conducted on RPV 1963 on Head Meridional Welds. The extent of examination as required by the referencing code section has been met in its entirety. Table 1A details the extent of examinations conducted

# Proposed Alternative Examinations

- 1. None
- 2. Inspection of the Code-required accessible length of one weld (Note 1) has been achieved and fully satisfies the extent of examination in accordance with ASME Section XI, 1980 Edition up to and including Winter Addenda 1981. Components addressed by this Relief Request are in compliance with Relief Request (R14) and listed in Table 1A.

Table 1A

Component ID	System	Extent Examined	Total Length	Limitation	- Remarks
VV-BH-1A	RPV Bottom Head	36" (1)	69"	Restricted Access	Ref. Dwg. 5.01-82D
VV-BH-1B	RPV Bottom Head	34" (1)	69"	Restricted Access	Ref. Dwg. 5.01-82D
VV-BH-1C	RPV Bottom Head	None	69"	Restricted Access	Ref. Dwg. 5.01-82D
VV-BH-1D	RPV Bottom Head	None	69"	Restricted Access	Ref. Dwg. 5.01-82D
VV-BH-1E	RPV Bottom Head	None	69"	Restricted Access	Ref. Dwg. 5.01-82D
VV-BH-1F	RPV Bottom Head	None	69"	Restricted Access	Ref. Dwg. 5.01-82D
VV-BH-1G	RPV Bottom Head	None	69"	Restricted Access	Ref. Dwg. 5.01-82D
VV-BH-1H	RPV Bottom Head	None	69"	Restricted Access	Ref. Dwg. 5.01-82D

Code Category B-A / Item No. B1.22 - Meridional Welds						
Component ID	System	Extent Examined	Total Length	Limitation	Remarks	
VV-BH-2A	RPV Bottom Head	None	54"	Inaccessible	Ref. Dwg. 5.01-82D	
VV-BH-2B	RPV Bottom Head	None	54"	Inaccessible	Ref. Dwg. 5.01-82D	
VV-BH-2C	RPV Bottom Head	None	54"	Inaccessible	Ref. Dwg. 5.01-82D	
VV-BH-2D	RPV Bottom Head	None	54"	Inaccessible	Ref. Dwg. 5.01-82D	
VV-BH-2E	RPV Bottom Head	None	54"	Inaccessible	Ref. Dwg. 5.01-82D	
VV-BH-2F	RPV Bottom Head	None	54"	Inaccessible	Ref. Dwg. 5.01-82D	

#### NOTE:

(1) Cumulative total for the extent of examination performed during the 2nd Ten-Year Interval on RPV Bottom Head Meridional Welds is 70" which exceeds the total length (69") of one Meridional weld.

# **ENCLOSURE 1A**

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Code Category B-D:

Full Penetration Welds of Nozzles in Vessels-Inspection

Item No. B3.90

Nozzle -to-Vessel Welds

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of volumetric examination for the following Full Penetration RPV Nozzle Welds listed in Table 2.

#### **Examination Requirements**

ASME Section XI, 1980 Edition through Winter 1981 Addenda, requires 100% volumetric examination of the weld plus ½ the wall thickness of adjacent base metal on each side of the weld.

#### Basis for Relief

Complete inspection of the Code-required volume is not possible based on restricted access caused by interference from permanent structures such as non-removable vessel insulation, instrumentation lines/penetrations and other nozzles. Detailed measurements of these interferences were taken for the nozzles, which is typical for a given configuration (i.e.: N1(s), N2 (s), N4 (s), and N5(s)). The examination data detailing restricted access associated with the N-9 nozzle does not have the necessary detail to calculate the exact coverage achieved. In this case an estimate of examination coverage is used, based on the examination data sketch generated during the inspection.

#### **Proposed Alternative Examinations**

- No additional volumetric examinations will be performed. The RPV nozzle welds have been examined to the maximum extent practical from the outside surface.
- A visual inspection (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.

RPV Nozzle Welds addressed by this Relief Request are listed in Table 2. Drawings, 3ketches and the calculated volume of coverage in Enclosure 2 illustrate the restricted conditions encountered that limit examination coverage.



Table 2

	C							
Component	System	Extent Examined	Limitation	Remarks				
N-1A	RPV Recirc. Noz.	35 - 50%	Configuration/ Insulation	Typical Configuration for N-1(s)				
N-1B	RPV Recirc. Noz.	35 - 50%	Configuration/ Insulation	**				
N-2A	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	Typical Configuration for N-2(s)				
N-2B	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	53				
N-2C	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	64				
N-2D	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	0.				
N-2E	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	.54				
N-2F	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	46				
N-2G	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	44				
N-2H	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	44				
N-2J	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	66				
N-2K	RPV Recirc. Noz.	50 - 65%	Configuration/ Insulation	64				
N-3A	MS Noz.	50 - 60%	Configuration	Typical Configuration for N-3(s)				
N-3B	MS Noz.	50 -60%	Configuration	41				
N-3C	MS Noz.	50 - 60%	Configuration	45				
N-3D	MS Noz.	50 - 60%	Configuration	44				
N-4A	RPV FW Noz.	60 - 70%	Configuration/ Insulation	Typical Configuration for N-4(s)				
N-4B	RPV FW Noz.	60 - 70%	Configuration/ Insulation	64				

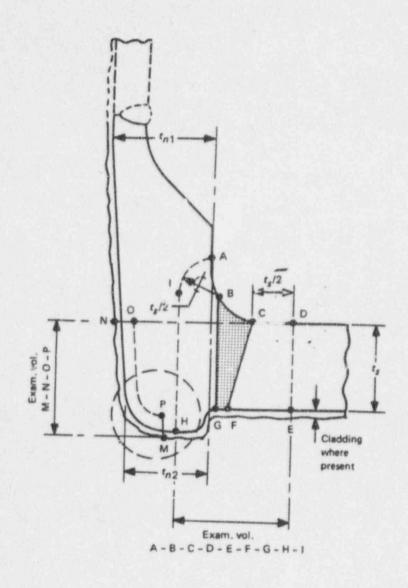
		Code Category I	3-D / Item No. B3.90	
N-4C	RPV FW Noz.	60 - 70%	Configuration/ Insulation	84
N-4D	RPV FW Noz.	60 - 70%	Configuration/ Insulation	44
N-5A	RPV CS Noz.	70%	Configuration/ Insulation	
N-8A	JPI Noz.	60 - 70*	Configuration/ Insulation	Typical Configuration for N8(s)
N-8B	JPI Noz.	60 - 70%	Configuration/ Insulation	
N-5B	RPV CS Noz.	70%	Configuration/ Insulation	46
VN-TH-A	RPV Head Noz.	60 - 70%	Configuration	
VN-TH-B	RPV Head Noz	60 - 70%	Configuration	
VN-TH-C	RPV Head Noz	60 - 70%	Configuration	
N-9	RPV CRD Noz.	Est. 60- 70%	Configuration/ Insulation	(1)

#### NOTE:

<sup>(1)</sup> Examination data lacks sufficient surface measures to further qualify the volume examined.

# **ENCLOSURE 2**

# Nozzle in Shell or Head Code Category B-D Code Required Coverage



Coverage Achieved for a Specific Weld or Component is Designated in Table 2 - Extent Examined

FIGURE 1

Code Category B-F: Pressure Retaining Dissimilar Metal Welds

Item No. B5.130 Piping Nominal Pipe Size ≥ 4"(Dissimilar Metal Butt Welds)

Item No: B5.130 Piping Nominal Pipe Size ≥ 4"(Dissimilar Metal Butt Welds)

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of volumetric examination for the following Pressure Retaining Dissimilar Metal Welds listed in Table 3.

#### **Examination Requirements**

ASME Section XI, 1980 Edition through Winter 1981 Addenda, requires the lower 1/st of the weld be examined volumetrically up to and including adjacent base metal 1/4" from the weld toe on either side of the weld.

#### Basis for Relief

Complete inspection of the Code-required volume is not possible based on restricted access due to the component's design. These welds represent the tie in of the RHR system to the Recirculation System on Loops A and B. The configuration of these welds are Valve-to-Valve, and Valve-to-Tee. The configuration of Welds 24-10-143, 24-10-142, 24-10-131, and 24-10-130 are not conducive to conventional ultrasonic examination techniques. This is attributed to dramatic thickness transitions on the outside and inside surfaces. On-going modifications to equipment and ultrasonic techniques currently being used are improving the testing parameters presently utilized to examine these components. Inspections of these components are based on calibration mock-up blocks of the same configuration and materials as the welds. These calibration mock-up blocks are designed with side drilled (SDH), end drilled (EDH) calibration holes along with numerous ID notches located within the heat effective zones, base material, buttered material and the weld. Supplemental liquid penetrant examinations were performed on these components which exceeds those required by Code Category B-F, Table 2500-1. An evaluation of testing results utilizing current ultrasonic technology has deemed these exams as best effort. The inspections conducted on Welds 24-10-132, 24-10-144 both (Elbow-to-Valve) and 10-14-481 are considered limited examinations employing industry acceptable inspection techniques. Weld 24-10-144 does not have a limited exam notation included on the inspection data but is clearly a one-sided exam and therefore is being submitted for relief.

#### **Proposed Alternative Examinations**

- No additional volumetric examinations will be performed on these welds. The components listed in this relief request have been examined to the maximum extent practical.
- A visual inspection (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.

Drawings and sketches that illustrate the restricted conditions encountered which limit examination coverage are included in Enclosure 3.

Table 3

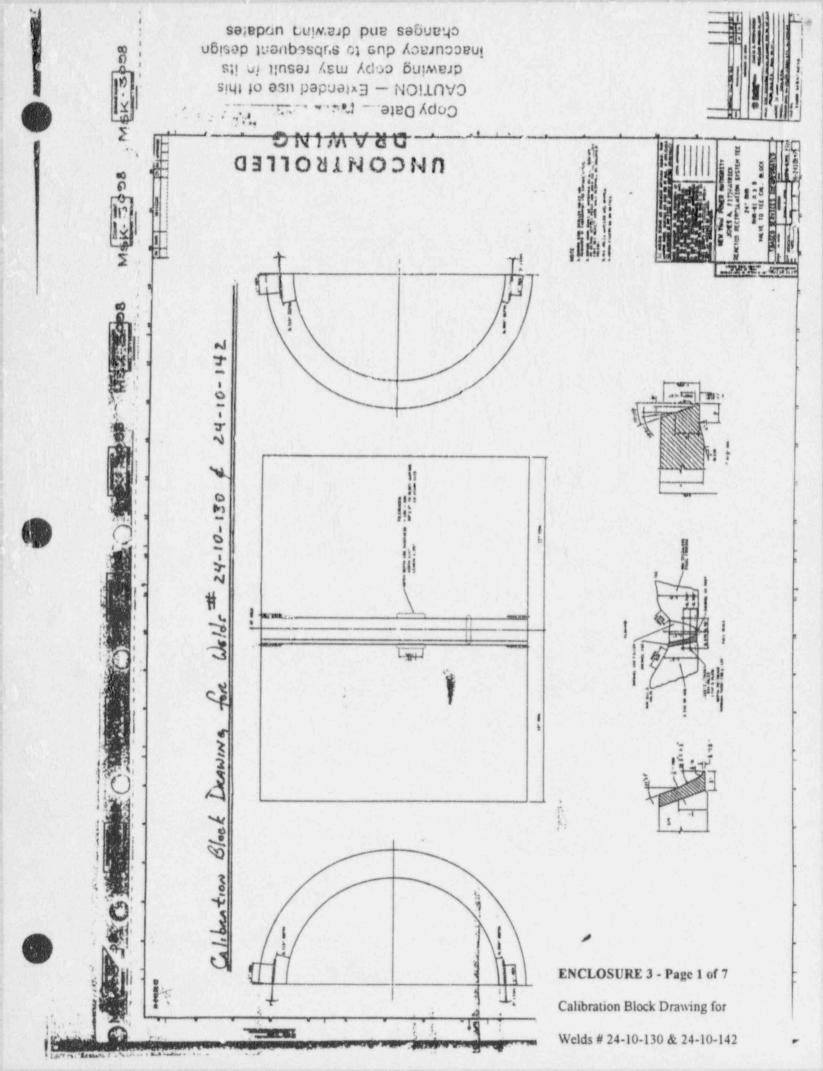
Code Category B-F /Item No.B5.130					
Component ID	System	Extent Examined	Limitation	Remarks	
24-10-142 (1)	RHR	Best Effort Est. 25 - 35%	OD Surface Contour	Tee-to-Valve (2)	
24-10-143 (1)	RHR	Best Effort Est. 25 - 35%	OD Surface Contour	Valve-to-Valve (2)	
24-10-144 (1)	RHR	70 - 80%	OD Surface Contour	Valve-to-Elbow (2)	
24-10-130 <sup>(1)</sup>	RHR	Best Effort Est. 25 - 35%	OD Surface Contour	Tee-to-Valve (2)	
24-10-131 (1)	RHR	Best Effort Est. 25 - 35%	OD Surface Contour	Valve-to-Valve (2)	
24-10-132 (1)	RHR	70 - 80%	OD Surface Contour	Valve-to-Elbow (2)	
10-14-481 (1)	Core Spray	65 -75%	OD Surface Contour	Pipe-to-Valve Pup Piece Extension	

#### NOTES:

(1)

All welds identified by this note are within the IGSCC Inspection Program
Sketches depicting OD profiles for welds 24-10-130, 24-10-131 and 24-10-132 are typical for 24-10-142, 24-10-143 and (2) 24-10-144.

# **ENCLOSURE 3**



Raytheon Engineers & Constructors

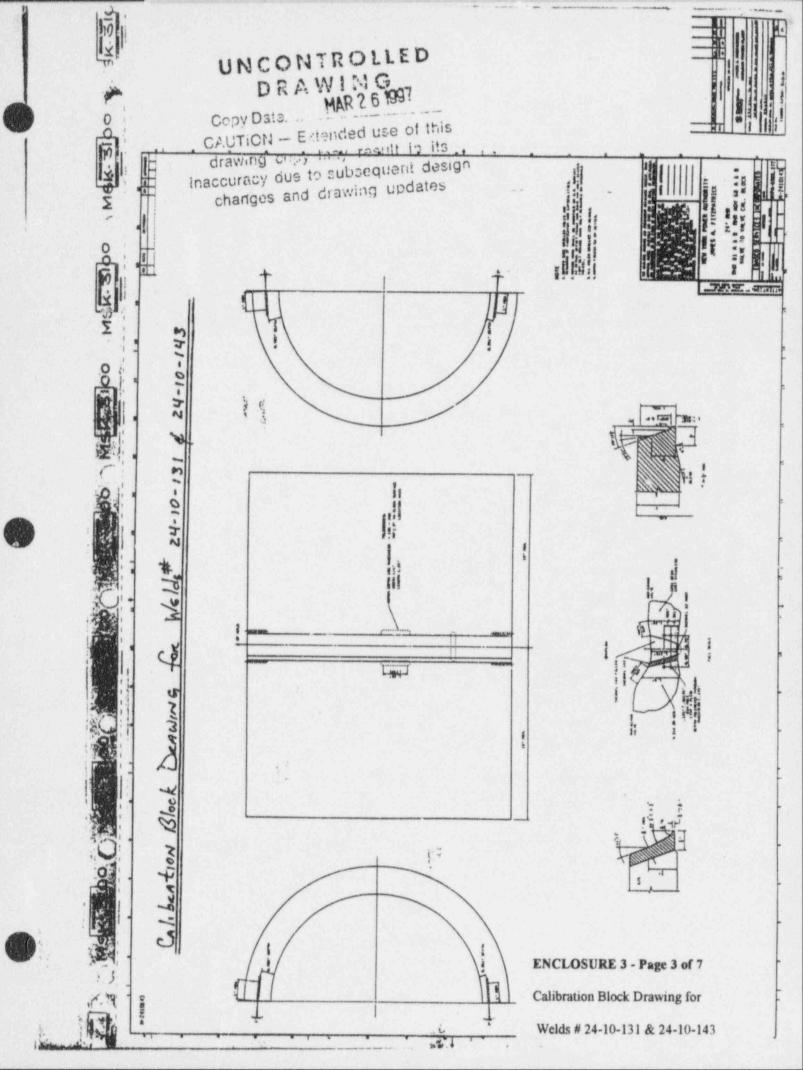
Michael

BY Koldring DATE 1/21/95 JAF-UT-093 2 0F 2 SHEET DEPT. 2542 CHKO. BY MO DATE 1/22/95 PROJECT JA FITZPATRICK SUBJECT 24-10-130 OD PROFILE TAKEN AT (5"CCW) TEE VALVE SS RHR 81A CS

ENCLOSURE 3 - Page 2 of 7

Weld # 24-10-130 OD Profile

m 37hhlar Ani 1.24.95

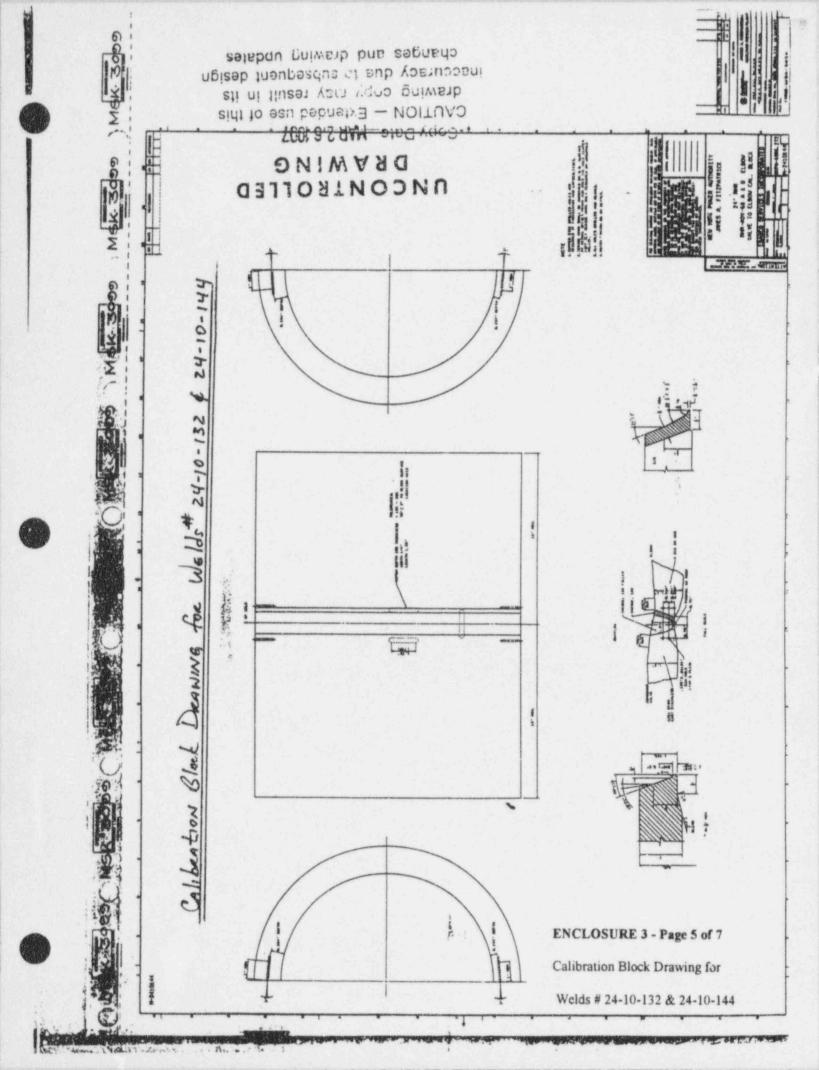


Raytheon Engineers & Constructors  BY Robbins DATE 1/21/95  CHKD. BY MO DATE 1/22/95  CLIENT NYPR  PROJECT JA FITZPATRICK SUBJECT 24-10-131 PROFILE (DD)	JAF-UT-092 SHEET 2 OF 2 OFS NO. 6100 DEPT. 2542
VALVE RHR 81 A CS	VALVE AOV-68A SS

ENCLOSURE 3 - Page 4 of 7

Weld # 24-10-131 Profile (OD)

IN 37/hollow ANI 1-24.85



Raytheon Engineers & Constructors

Muchael

BY Robbins

DATE 1/21/95 JAF-UT-091 SHEET 4 OF 4 OFS NO. 6/00 DEPT. 250 CHKD. BY MO JA FITZPATRICK 24-10-132 EXAM COVERAGE SUBJECT\_\_\_ ELB W CS 80.3% 1.3x.43=.55922. 100- (39.39+2)= exam volume EXAM COVERDOR one Sided ENCLOSURE 3 - Page 6 of 7 58 Weld # 24-10-132 Coverage Calc./Profile

## **Engineers & Constructors**

BY M. ORIHUELA, TO	DATE 1/14/95
CHKD. BY N/A	

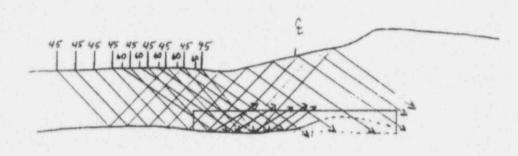
OFS NO. 16/00 SHEET 4 OF 4

OFS NO. 16/00 DEPT. 2542

CLIENT NYPA

PROJECT J. A. FITZPATRICK

SUBJECT\_ WELD # 10-14-481



TOTAL TO BE EXAMINED = 0.23" x 2.2" = 0.506 in2

AREA EXAMINED IN 2 DIRECTIONS = 0.506 - 0.251 = 0.255 m2

$$\begin{bmatrix}
 0.255" + (0.25") \\
 \hline
 0.506"
 \end{bmatrix}$$

X100% = 75.2% COVERAGE.

M. O. LV. III

ENCLOSURE 3 - Page 7 of 7

Weld # 10-14-481

Coverage Calc. & Profile

N 5 7holow ANI 1-20-95

Code Category B-G-1: Pressure Retaining Bolting, Greater than 2 in. In Diameter

Item No. B6.40 Threads in Flange
Item No. B6.190 Flange Surface, when connection disassembled

Item No. B6.40 RPV Threads in Flange

#### **Examination Requirements**

The Code requirement for examination of RPV Threads in Flange is 100% volumetric inspection each Interval when the connections are disassembled.

#### Relief Request

The Authority is requesting relief from the twenty-two (22) RPV Threads in Flange examinations not examined during the 2nd Ten-Year Interval accordance with the provisions of 10 CFR 50.55a (a)(3)(ii).

#### Basis for Relief

During the closeout review of JAF's 2nd Ten-Year Inservice Inspection Interval for Code Category B-G-1, Item No. B6.40, RPV Threads in Flange, a total of thirty (30) examinations were performed out of a total population of fifty-two (52). The inspection requirement to examine 100% of the RPV Threads in Flange was not met in its entirety due to an administrative oversight and a Code interpretational discrepancy.

Industry experience has not identified a degradation mechanism or failure associated with the RPV Threads in Flange. The Authority does not consider taking the unit off line and removing the RPV Head for the sole purpose of examining the twenty-two (22) RPV Threads in Flange as providing an increase in the level of quality and safety already achieved by the examinations performed.

## Proposed Alternative Examination

- 1. The Authority is requesting relief from the twenty-two (22) RPV Threads in Flange examinations for the 2nd Ten-Year Interval and is committing to examine these during the 3rd Interval, 1st period, first refuel outage (RO13). The twenty-two RPV Threads in Flange examinations committed to based on this relief will be performed in addition to the 3rd Ten-Year ISI Inspections requirements.
- A visual inspection (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.



Table 4

Code Category B-G-1 / Item No B6.40					
Component ID	System	Description	Examined	Limitation	Relief Requested
1 - thru - 15	RPV	Threads in Flange	Yes	None	No
16 - thru- 37	RPV	Threads in Flange	No	None	Yes
38 - thru - 52	RPV	Threads in Flange	Yes	None	No

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### Item No: B6.190 Flange Surface, when connection disassembled

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(ii) from the full Code-required extent of examination for the Flange Surface of components listed in Table 4A.

### **Examination Requirements**

This request for relief is being submitted in accordance with the NRC's Safety Evaluation (SE) of the 2nd Ten-Year Inservice Inspection Program, Dated October 27, 1987, Docket No. 50-333 Relief Request (R5B). Relief Request 5 (R5B) requires inspection of these components when disassembled for maintenance and stipulates relief from examination of specific components not disassembled will be requested at the end of the interval.

#### Basis for Relief Examination

Components addressed by this Relief Request are listed in Table 4A. The recirculation pump flange surfaces are only accessible when the pumps are disassembled. These pumps were not disassembled during the 2nd Ten-Year Interval. A visual inspection (VT-2), pressure test is conducted on these components every refuel outage in accordance with IWA-5000 and IWB-5000.

### Proposed Alternative

- 1. None
- The requirements for examination on these components met the approved Relief Request (R5B) for the 2nd Ten -Year ISI Inspection Interval in its entirety. Components addressed in this request for relief are listed in Table 4A.

Table 4A

	Co	de Category I	B-G-1 / Item No B	6.190		
Component ID	System	Pump Type	Disassembled	Examined	Limitation	Relief Request
02-2P-1A	Recirc.	Centrifugal	No	No	Not Accessible	R5B
02-2P-1B	Recirc.	Centrifugal	No	No	Not Accessible	R5B

## **ENCLOSURE 4A**

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### **SECTION 5**

THIS SECTION HAS BEEN REMOVED

Code Category B-H:

Integral Attachments for Vessels

Item No. B8.10

**RPV Integral Welded Attachments** 

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of examination for RPV Integral Welded Attachments listed in Table 6.

### Examination Requirements

All RPV Integral Welded Attachments require a 100% volumetric or surface examination once per interval.

### Basis for Relief

Complete inspection of the Code-required volume is not possible based on restricted access caused by design. Examination coverage of VC-SKC (vessel skirt weld) includes 100% of the OD surface being examined using the MT method and a supplemental examination using remote visual equipment (VT-1) was performed on 100% of the inside surface. Access to the inside surface of weld VC-SKC is restricted due to the component's design. Drawings of vessel skirt weld VC-SKC are in Enclosure 6 which highlight the inspection surfaces and restricted access caused by design. Examination coverage of Stabilizer-1, 2, 3, and 4 included 35% of these welds being inspected by MT and the remaining 65% being inspected by VT-1. Components addressed by this Relief Request are listed in Table 6. Drawings and sketches that illustrate the restricted conditions encountered that limit access to the Vessel Skirt Weld and Stabilizer Brackets are included in Enclosure 6.

### Proposed Alternative

- No additional volumetric and/or surface examinations will be performed on these welds.
  The components listed in this relief request have been examined to the maximum extent practical.
- A visual inspection (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.

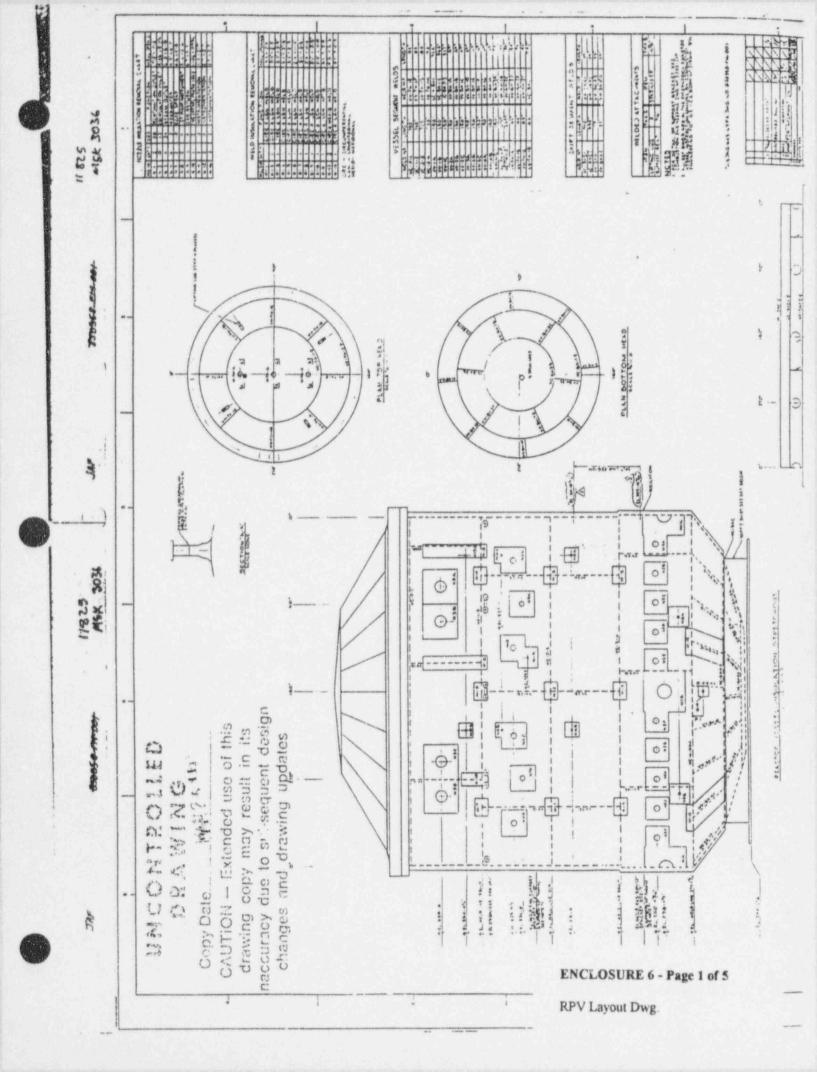


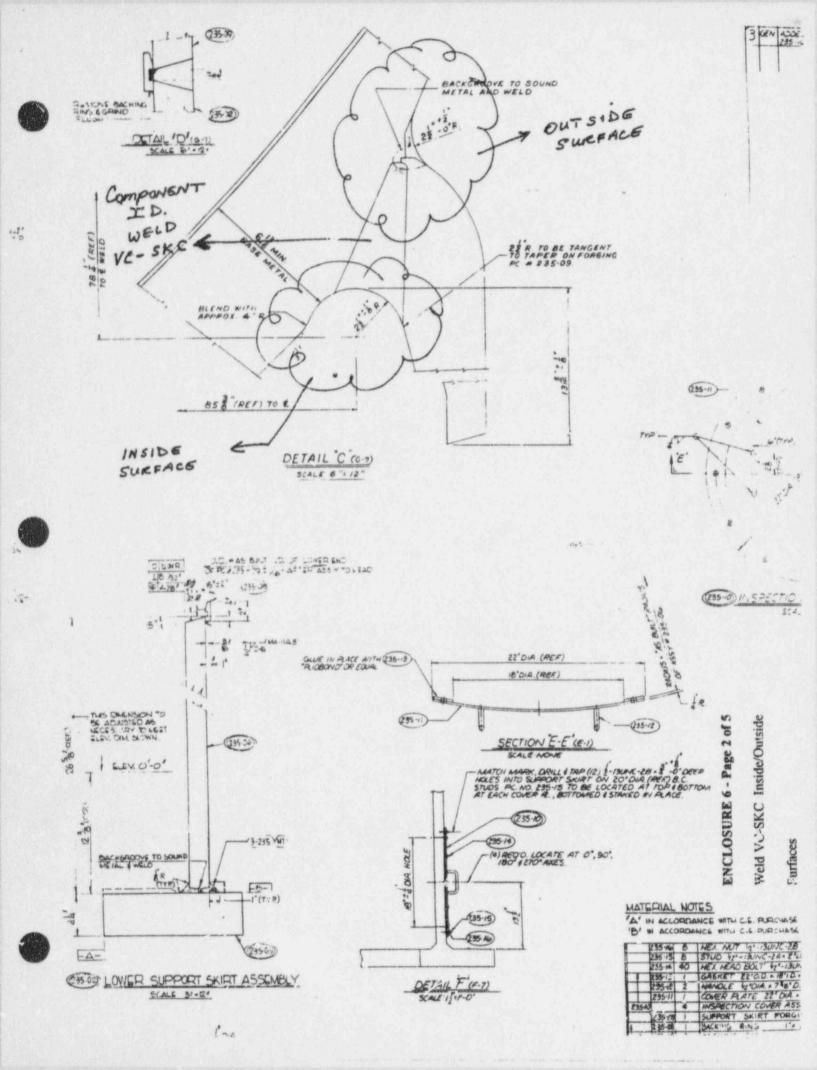
Table 6

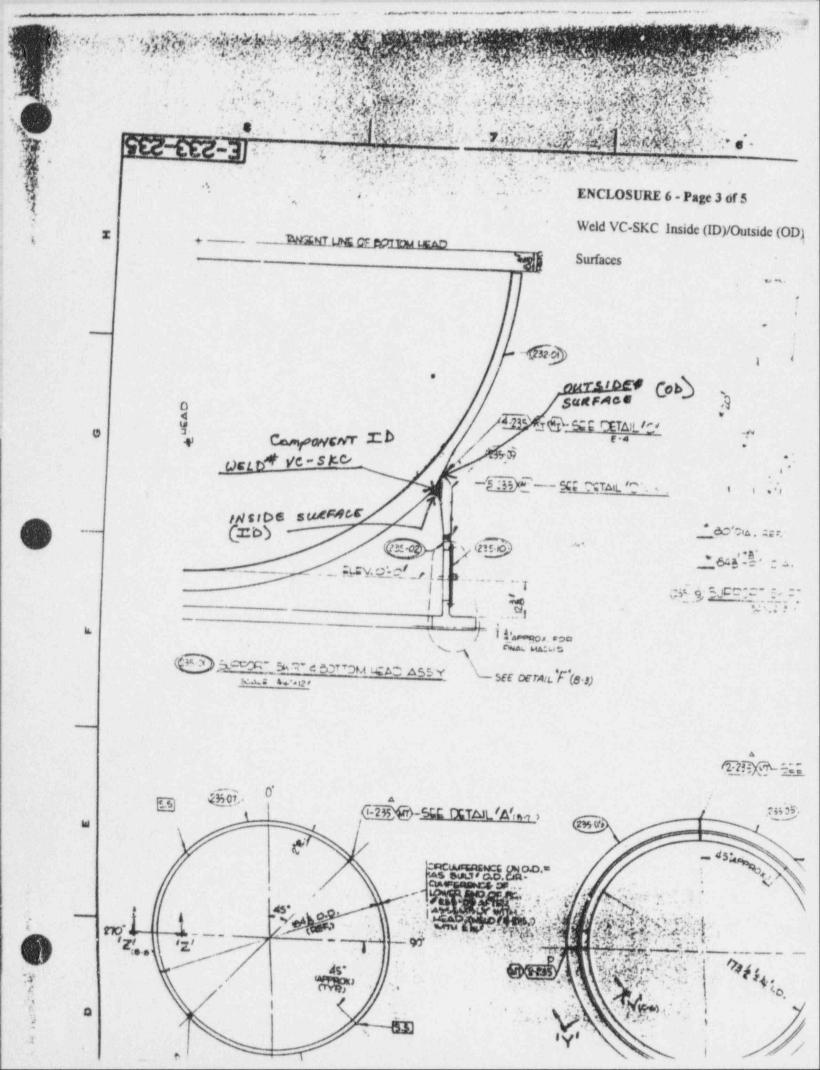
na water and the same of the s	A month of the second s	Code Catego	ry B-H / Item No.B8.10	
Component ID	System	Extent Examined	Limitations	Remarks
VC-SKC	RPV	50%	Configuration	(1)
Stabilizer-1	RPV	34%	Configuration	Ref. Encle sure 6
Stabilizer-2	PPV	34%	Configuration	Ref. Enclosure 6
Stabilizer-3	RPV	34%	Configuration	Ref. Enclosure 6
Stabilizer-4	RPV	34%	Configuration	Ref. Enclosure 6

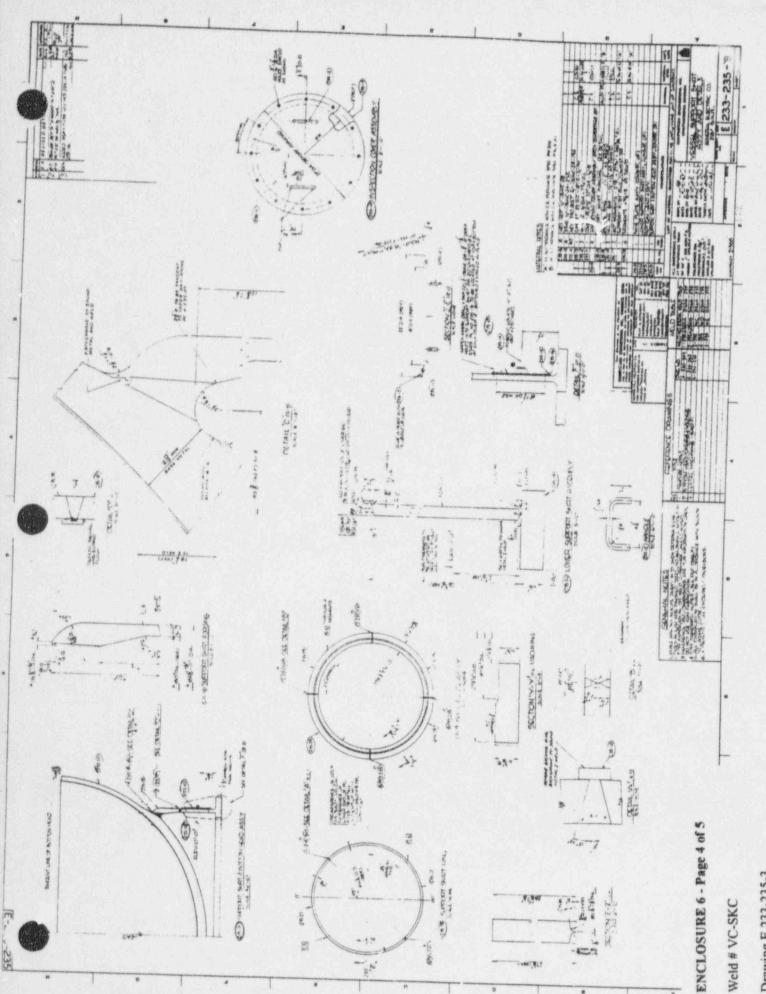
#### NOTE:

(1) 100% of outside surface examined using MT only and 100% of inside surface examined using VT only. Reference drawings in Enclosure 6 detailing examination coverage.









Drawing E 233-235-3

10 3 7h hom an 1.04.95

(4) THIS SKETCH IS NOT DRAWN TO SCALE.

Code Category B-J:	Pressure Retaining Welds in Piping
Item No. B9.10	Nominal Pipe Size ≥ 4 in.
Item No. B9.11	Circumferential Welds
Item No. B9.30	Branch Pipe Connection Welds
Item No. B9.31	Nominal Pipe Size ≥ 4"
Item No. B9.10	Nominal Pipe Size ≥ 4 in.
Item No. B9.11	Circumferential Welds

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of surface and/or volumetric examination for Circumferential Welds listed in Table 7.

### **Examination Requirement**

ASME Section XI, 1980 Edition through Winter 1981 Addenda, requires the lower 1/st of the weld examined volumetrically up to and including adjacent base metal 1/4" from the weld toe on either side of the weld. Surface examinations requires the weld inspection and includes 1/2" on either side of the weld toe.

### Basis for Relief

Complete inspection of the Code-required volume for components listed in Table 7 is not possible based on the restricted access caused by component design, support structures, and/or other interferences. Examinations performed on the majority of these components have detailed measurements of limitations, restrictions and interferences, along with the estimated computed volume of inspection coverage. Some examinations performed during the beginning of the inspection interval do not have the detailed measurements necessary to estimate the percentage of exam coverage. Most of the cases in which this occurs, the examiner notes a one-sided exam was performed and others state limited exam. When a one-sided exam is recorded or a limited exam is confirmed as a one-side exam (no other restrictions) through drawing verification, a 50% exam coverage credit is taken. If a limited or restricted exam is noted but not enough information exists to derive a percentage of coverage, it will be so noted.

### Proposed Alternative

- No additional volumetric and/or surface examinations will be performed on these welds.
  The components listed in this relief request have been examined to the maximum extent
  practical.
- A visual inspection (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.



# A typical configuration drawing which illustrates restricted is in Enclosure. Table 7

annical annical annical surface	DESCRIPTION OF	general per la company de la c	Code Category	B-J / Item No. B9.11	
Componer ID	it	System	Extent Examined	Limitation	Remarks
12-02-2-26	(2)	Recirc.	50% (1)	OD Surface Contour	Pipe-to-Reducer
22-02-2-28	(2)	Recirc.	50% (1)	OD Surface Contour	Cross-to-Header
22-02-2-29	(2)	Recirc.	50% (1)	OD Surface Contour	Cross-to-Header
28-02-2-31	(2)	Recirc.	50% (1)	OD Surface Contour	Pipe-to-Tee
28-02-2-34	(2)	Recirc.	50% (1)	OD Surface Contour	Elbow-to-Valve
28-02-2-35	°(2)	Recirc.	50% (1)	OD Surface Contour	Pipe-to-Valve
28-02-2-37	(2)	Recirc.	50% (1)	OD Surface Contour	Pump-to-Pipe
28-02-2-50	(2)	Recirc.	60 -70%	Whip Restraint	Elbow-to-Pipe
28-02-2-54	(2)	Recirc.	50% (1)	OD Surface Contour	Valve-to-Pipe
28-02-2-57	(2)	Recirc.	50% (1)	OD Surface Contour	Elbow-to-Pump
12-02-2-84	(2)	Recirc.	50% (1)	OD Surface Contour	Pipe-to-Reducer
22-02-2-86	(2)	Recirc.	63%	OD Surface Contour	Header-to-Cross
22-02-2-87	(2)	Recirc.	63%	OD Surface Contour	Header-to-Cross
28-02-2-89	(2)	Recirc.	50% (1)	OD Surface Contour	Pipe-to-Tee
28-02-2-104	(2)	Recirc.	50% (1)	OD Surface Contour	Pipe-to-Valve
28-02-2-105	(2)	Recirc.	50% (1)	OD Surface Contour	Pump-to-Pipe
28-02-2-109	(2)	Recirc.	50% (1)	OD Surface Contour	Pipe-to-Tee
28-02-2-110	(2)	Recirc.	50% (1)	OD Surface Contour	Tee-to-Pipe
28-02-2-112	(2)	Recirc.	88%	OD Surface Contour	Valve-to-Pipe
N-8A-SE-1	(2)	JРI	50% (1)	OD Surface Contour	Reducer-to-Reducer
N-8B-SE-1		JPI	62%	OD Surface Contour	Reducer-to-Reducer
N-8A-SE-3		JPI	68%	Code Plate	Pipe-to-Cap
N-8B-SE-3	(2)	JPI	68%	Code Plate	Pipe-to-Cap
4-02-2-117	(2)	JPI	63%	OD Surface Contour	SE-to-Reducer
6-12-901-1		RWCU (9)	70% (1)	OD Surface Contour	Pipe - Valve

		Code Category	B-J / Item No. B9.11	
6-12-141B-1	RWCU (9)	50% (1)	OD Surface Contour	Valve-to-Pipe
20-10-120-1	RHR (7)	50% (1)	OD Surface Contour	Pipe-to-Tee
24-10-149	RHR (7)	Est. 80%	Welded Support	Pipe-to-Pipe
Component ID	System	Extent Examined	Limitation	Remarks
10-14-471	CS (6)	Est. 75%	OD Surface Contour	Pipe-to-SE
10-14-492 (2)	CS (6)	Est. 80%	OD Surface Contour	Pipe-to-SE
10-14-493 (2)	CS (6)	Est. 80% (1)	Drain Line	Elbow-to-Elbow
10-23-677	HPCI (8)	Est. 70-80%	Socket Weld Conn	Eibow-to-Pipe
24-29-543A	MS (5)	70 - 80%	Instr. Line/ OD Surface Contour	Elbow-to-Pipe
24-29-557	MS (5)	Est. 65 - 75%	Saddle 'Weld Obstruction	Pipe-to-Pipe
24-29-572	MS (5)	75%	Welded Support	Limitation applies to Surf
24-29-605	MS (5)	75%	Welded Support	Limitation applies to Surf. and Vol. Exams
12-34-402	FW (4)	50% (3)	Air Duct Obstruction	Pipe-to-Pipe

#### NOTES:

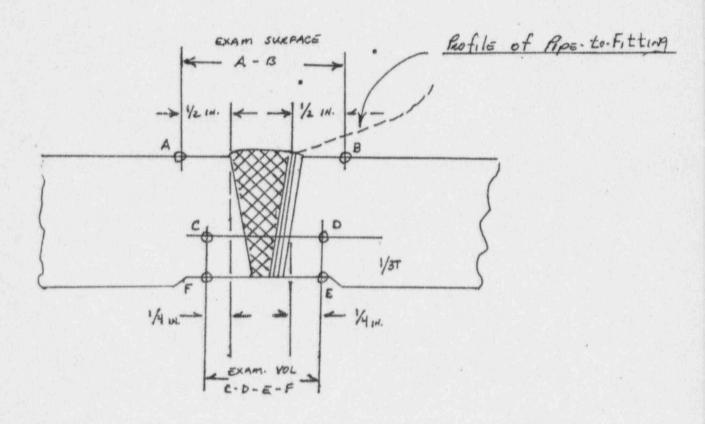
- (1) When a one-sided exam is recorded or a limited exam is confirmed as a one-sided exam, (no other restrictions), through drawing verification a 50% exam coverage credit is taken.
- (2) All welds identified by this note are within the IGSCC Inspection Program
- (3) The limited examination coverage of this weld only applies to the surface inspection full examination coverage was achieved by the volumetric method.
- (4) The total weld population for the Feedwater System under this item number is 76 welds. The total number requiring volumetric and surface examinations is 25% = 19 welds. The total number of volumetric and surface examinations performed on welds within this item number for the 2nd Ten-Year Interval is 34 = 45%.
- (5) The total weld population for the Main Steam System under this item number is 109 welds. The total number requiring volumetric and surface examinations is 25% = 28 welds. The total number of volumetric examinations performed on welds within this item number for the 2nd Ten-Year Interval is 32 = 29%.
- (6) The total weld population for the Core Spray System under this item number is 51 welds. The total number requiring voluments and surface examinations is 25% = 13 welds. The total number of volumetric and surface examinations performed on welds within this item number for the 2nd Ten-Year Interval is 17 = 33%.
- (7) Total weld population for the RHR System under this item number is 47 welds. The total number requiring volumetric and surface examinations is 25% = 12 we'.'s. The total number of volumetric and surface examinations performed on welds within this item number for the 2nd Ten-Year Interval is 12 = 25%.
- (8) Total weld population for the HPCI System under this item number is 26 welds. The total number requiring volumetric and surface examinations is 25% = 7 welds. The total number of volumetric and surface examinations performed on welds within this item number for the 2nd Ten-Year Interval is 11 = 42%.
- (9) Total weld population for the RWCU System under this item number is 32 welds. The total number requiring volumetric and surface examinations is 25% = 8 welds. The total number of volumetric and surface examinations performed on welds within this item number is 12 = 37%.

### Similar and Dissimilar Metal Welds in Components and Piping

Code Category B-F & B-J

NPS Greater Than 4 in.

Code Required Volume (CRV)



Coverage Achieved for a Specific Weld or Component is Designated in Table 7 - Extent Examined

Item No. B9.30 Item No. B9.31 Branch Pipe Connection Welds Nominal Pipe Size ≥ 4"

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of volumetric examination for Branch Pipe Connection Welds (Nominal Pipe Size ≥ 4").

### **Examination Requirements**

ASME Section XI, 1980 Edition through Winter 1981 Addenda, requires the lower 1/st of the weld examined volumetrically up to and including adjacent base metal 1/4" from the weld toe on either side of the weld.

### Basis for Relief

Complete inspection of the Code-required volume for components listed in Table 7A is not possible based on restricted access caused by their design. All components in this request for relief are within the IGSCC Inspection Program and have been inspected in accordance with Generic Letter 88-01 by EPRI qualified examiners. Inspection techniques that are qualified through EPRI or PDI for the detection of IGSCC is limited to same side examinations. Techniques have not been developed that can qualify IGSCC detection from the far side of the weld. Components with one-sided access, whether due to configuration and/or OD surface contour, fall into this category. Some examinations performed on these components occurred during the beginning of the inspection interval and do not have the detailed measurements necessary to accurately calculate the percentage of exam coverage. When a one-sided exam is recorded or a limited exam is confirmed as a one-sided exam (no other restrictions) through examination data and drawing verification, a 50% exam coverage credit will be taken. If a limited or restricted exam is noted but not enough information exists to derive a percentage of coverage, it will be so noted.

### Proposed Alternative

- No additional volumetric and/or surface examinations will be performed on these welds.
  The components listed in this relief request have been examined to the maximum extent practical.
- A visual inspection (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.

Drawings and sketches which illustrate the restricted conditions encountered, (in some cases typical for a given configuration), that limit examination coverage are in Enclosure 7A.

	MAKEN KAN	A Secondarion of the Control of the	Code Categor	y E-J / Item No. B9.31	
Component ID		System	Extent Examined	Limitation	Remarks
12-02-2-4	(2)	Recirc.	79% (1)	OD Surface Contour	Swpli-to-Pipe
22-02-2-5	(2)	Recirc.	50% (1)	Configuration	Saddle Weld
12-02-2-10	(2)	Recirc.	50% (1)	OD Surface Contour	Swplt-to-Pipe
22-02-2-11	(2)	Recirc.	50% (1)	Configuration	Saddle Weld
22-02-2-16	(2)	Recirc.	50% (1)	Configuration	Saddle Weld
12-02-2-20	(2)	Recirc.	50% (1)	OD Surface Contour	Swplt-to Pipe
28-02-2-55	(2)	Recirc.	50% (1)	One-sided Exam	Branch Connection
12-02-2-61	(2)	Recirc	50% (1)	One-sided Exam	Branch Connection
22-02-2-62	(2)	Recirc.	50% (1)	Configuration	Saddle Weld (3)
12-02-2-67	(2)	Recirc.	50% (1)	OD Surface Contour	Swplt-to-Pipe
12-02-2-72	(2)	Recirc.	50% (1)	OD Surface Contour	Swplt-to-Pipe
12-02-2-78	(2)	Recirc.	50% (1)	OD Surface Contour	Swplt-to-Pipe
28-02-2-114	(2)	Recirc.	50% (1)	One-sided Exam	Branch Connection (4

#### NOTES:

- (1) When a one-sided exam is recorded or a limited exam is confirmed as a one-sided exam, (no other restrictions), through drawing verification, a 50% exam coverage credit is taken.
- (2) All welds identified by this note are within the IGSCC Inspection Program
- (3) Weld 22-02-2-62 has a saddle weld configuration that is typical of 22-02-2-5.
- (4) Weld 28-02-2-114 has a branch connection configuration that is typical of Weld 28-02-2-55.
- (5) Swplt = Sweep-o-let

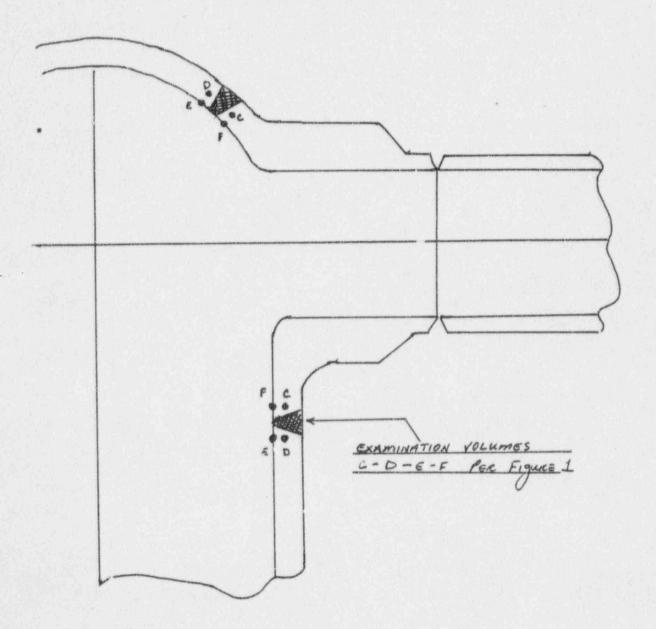
## **ENCLOSURE 7A**

Pipe Branch Connection

Code Category B-J

NPS Greater Than 4 in.

Code Required Volume (CRV)



Coverage Achieved for a Specific Weld or Component is Designated in Table 7A - Extent Examined

FIGURE 2

Code Category B-K-1: Integral Attachments for Piping, Pumps, and Valves

Item No. B10.10 Piping Integrally Welded Attachments

Relief is requested pursuant to the provisions of 10 CFR 50.55a (a)(3)(I), and 10 CFR 50.55a (a)(3)(ii) from the ASME Boiler and Pressure Vessel Code surface or volumetric examination requirements of eight (8) integrally welded attachments listed in Table 8, and incomplete examination of the Code-required surfaces for components listed in Table 8A.

### **Examination Requirements**

ASME Code Section XI, 1980 Edition through Winter 1981 Addenda requires examinations to include the welded attachment of piping required to be examined by Examination Category B-J, and includes essentially 100% of the weld length, for those attachments whose base material design thickness is 5/8 in. and greater.

### Basis For Relief Pursuant to 10 CFR 50.55a (a)(3)(I)

During the review of the JAF 2nd Ten-Year Inservice examinations for Category B-K-1 interval closeout, eight (8) integrally welded piping attachments were not examined out of a total required population of fifty-four (54).

Reactor Recirculation System - Seventeen (17) integrally welded attachments were examined, (accepted by examination for continued service), out of a total population of twenty (20), which provides an overall system percentage completion of 85% for Examination Category B-K-1.

Main Steam System - Twenty-five (25) integrally welded attachments were examined, (accepted by examination for continued service), out of a total population of forty-two (42), which provides an overall system percentage completion of 60% for Examination Category B-K-1.

Overall Status for the Interval - Forty-seven (47) nonexempt integrally welded piping attachments out of a total nonexempt population of fifty-four (54) Category B-K-1 components in all of the Class 1 Systems were examined during JAF 2nd Inservice Inspection Interval, for a total percentage examined of 87%. All other Class 1 systems meet ASME Section XI 1980 Edition, Winter 81 Addenda criteria for Program B requirements in it's entirety.

The ASME B&PVC recognized that the extent of examination for B-K-1 integrally welded attachments by earlier code editions was impractical. To address this issue ASME issued Code Case N-509, which is pending approval by USNRC through Reg. Guide 1.147 Rev. 12. If Code Case N-509 was applied to the two (2) systems above the percentages examined would far exceeds the 10% examination requirements of the Code Case. The extent of examinations performed, coupled with the system pressure tests, will provide an acceptable level of quality and safety.

### Proposed Alternative Examinations

None

### Basis for Relief of Partial Examinations Pursuant to 10 CFR 50.55a(a)(3)(ii)

Components addressed within this relief are welded attachments that have limitations and restrictions which impede inspection coverage. Drawings and sketches which illustrate the restricted conditions encountered that limit examination coverage are in Enclosure 8.

### Proposed Alternative

- No additional volumetric and/or surface examinations will be performed on these welds.
  The components listed in Table 8A of this relief request have been examined to the
  maximum extent practical.
- A visual inspection (VT-2) is performed in conjunction with the pressure testing conducted on these components every refuel outage (with no leakage detected) in accordance with IWA-5000 and IWB-5000, which provides reasonable assurance of component integrity.

Table 8

	Code Category B-K-1/Item	No. B10.10
Component ID	System	Description
24-29-527A	24.0" M S System	Integrally Welded Attachment
24-29-539B	24.0" M S System	Integrally Welded Attachment
24-29-572A	24.0° M S System	Integrally Welded Attachment
24-29-585B	24.0" M S System	Integrally Welded Attachment
24-29-593A	24.0" M S System	Integrally Welded Attachment
28-02-2-51A	28.0" Reactor Recirc. System	Integrally Welded Attachment
28-02-2-31A	28.0" Reactor Recirc. System	Integrally Welded Attachment
28-02-2-89C	28.0" Reactor Recirc. System	Integrally Welded Attachment

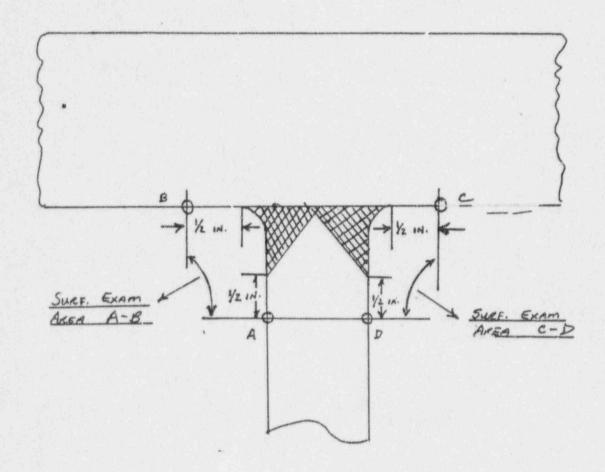
Table 8A

	Code	Category B-K-1	/ B10.10	
Component ID	System	Extent Examined	Limitation	Remarks
28-02-2-31C	Recirc.	60-70%	Support Obstruction	See Enclosure 8
28-02-2-110E	Recirc.	60 - 70%	Support Obstruction	See Enclosure 8
24-29-605B	Main Steam	50-60%	Circ. Weld Interference	See Enclosure 8
24-29-618A	Main Steam	50%	Restricted Access	See Enclosure 8

Integral Attachment

Code Category B-K-1

Code Required Coverage



Coverage Achieved for a Specific Weld or Component is Designated in Table 8 - Extent Examined

FIGURE 1

### **ENCLOSURE 8A**

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Code Category B-L-2: Pump Casings

Item No. B12.20 Internal Surfaces

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(ii) from the full Code-required extent of visual examination for Pump Casing Internals for components listed in Table 9.

#### **Examination Requirements**

This request for relief is being submitted in accordance with NRC Safety Evaluation (SE) of the 2nd Ten-Year Inservice Inspection Program, Dated October 27, 1987, Docket No. 50-333 approved Relief Request 5 (R5B). Relief Request 5 (R5B) requires visual (VT-3) inspection of internal surfaces of pump casings once per interval when these components are disassembled for maintenance and stipulates that relief from examination of specific components not disassembled will be submitted at the end of the interval.

#### Basis for Relief Examination

The recirculation pump internal surfaces are only accessible when the pumps are disassembled. These pumps were not disassembled during the 2nd Ten-Year Interval. A visual inspection (VT-2), pressure test is conducted on these components every refuel outage in accordance with IWA-5000 and IWB-5000. This request for relief is being submitted in accordance with JAF's 2nd Ten-Year Interval Inservice Inspection Program approved Relief Request 5 (R5B). Components addressed by this Relief Request are listed in Table 9.

### Proposed Alternative

- 1. None
- 2. The requirements for examination on these components met the approved Relief Request (R5B) for the 2nd Ten-Year ISI Inspection Interval in its entirety. Components addressed in this request for relief are listed in Table 9.

Table 9

THE PARTY NAMED IN COLUMN 2 IN	Tiggiowen was to the control of the	Code Cate	gory B-L-2 / Ites	n No. B12.20		
Component ID	System	Pump Type	Function	Disassembled	Examined	Relief Request
02-2P-1A	Recirc.	Centrifugal	Recirculation	No	No	R5B
02-2P-1B	Recirc.	Centrifugal	Recirculation	No	No	R5B

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Code Category B-M-2: Valve Bodies > 4" Nominal Pipe Size

Item No. B12.50 Internal Surfaces

Relief is requested in accordance with the provisions of 10 CFR 50.55a(a)(3)(ii) from the full Code-required extent of visual examination for Valve Body Internals listed in Table 10.

### **Examination Requirements**

This request for relief is being submitted in accordance with NRC Safety Evaluation (SE) of the 2nd Ten-Year Inservice Inspection Program, Dated October 27, 1987, Docket No. 50-333 approved Relief Request 5 (R5C). Relief Request 5 (R5C) requires visual (VT-3) inspection of internal surfaces of valve bodies once per interval when these components are disassembled for maintenance and stipulates that a relief from examination of specific components not disassembled will be submitted at the end of the interval.

#### Basis for Relief

The valve internal surfaces are only accessible when the valves are disassembled. These valves were not disassembled during the 2nd Ten-Year Interval. A visual inspection (VT-2), pressure test is conducted on these components every refuel outage in accordance with IWA-5000 and IWB-5000. This request for relief is being submitted in accordance with JAF's 2nd Ten-Year Interval, Inservice Inspection Program approved Relief Request 5 (R5C). The Authority has elected to implement a conservative inspection criteria for valves. This inspection selection criteria is based not only on type of valve and function but also on which system requires a larger population, (i.e.: gates valves), and an increased frequency of inspection for those valves that are disassembled more than once per interval. This request is being submitted in accordance with the approved NRC Relief Request (R5C) for the 2nd Ten Year Interval. Components addressed by this Relief Request are listed in Table 10.

### **Proposed Alternative**

None

Table 10

	Marie Commission of the Commis	Code Categ	ory B-M-2 / It	em No. B12.50		
Component	System	Valve Type	Function	Disassembled	Examined	Relief Request
02MOV-43A	Recirc.	Gate	Isolation	No	No	R5C
02MOV-43B	Recirc.	Gate	Isolation	No	No	R5C
02MOV-53A	Recirc.	Gate	Isolation	No	No	R5C
02MOV-53B	Recirc.	Gate	Isolation	No	No	R5C
13MOV-21	RCIC	Gate	Isolation	No	No	R5C
34FWS-29A	FW	Gate	Isolation	No	No	R5C
34FWS-29B	FW	Gate	Isolation	No	No	R5C

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Code Category B-O:

Pressure Retaining Welds in Control Rod Housings

Item No. B14.10:

Welds in CRD Housing

### **Examination Requirements**

ASME Section XI requires that 10% of the pressure retaining welds in peripheral CRD Housings are inspected once every interval.

#### Basis for Relief

Access is limited to four 18" diameter manways 90° apart in the vessel support skirt. In addition, the one-hundred and thirty-seven (137) control rod drives and forty-three (43) in-core monitor instrumentation penetrations present extensive interference. The positioning and spacing of these components prevent an inspector from physically being able to reach beyond the manway openings. Based on design, there are 28 peripheral CRD housings and (12) twelve = 42%, have been inspected. CRD Housing Welds inspected during the 2nd Ten-Year Interval are listed in Table 11 and are illustrated in the drawings of Enclosure 11.

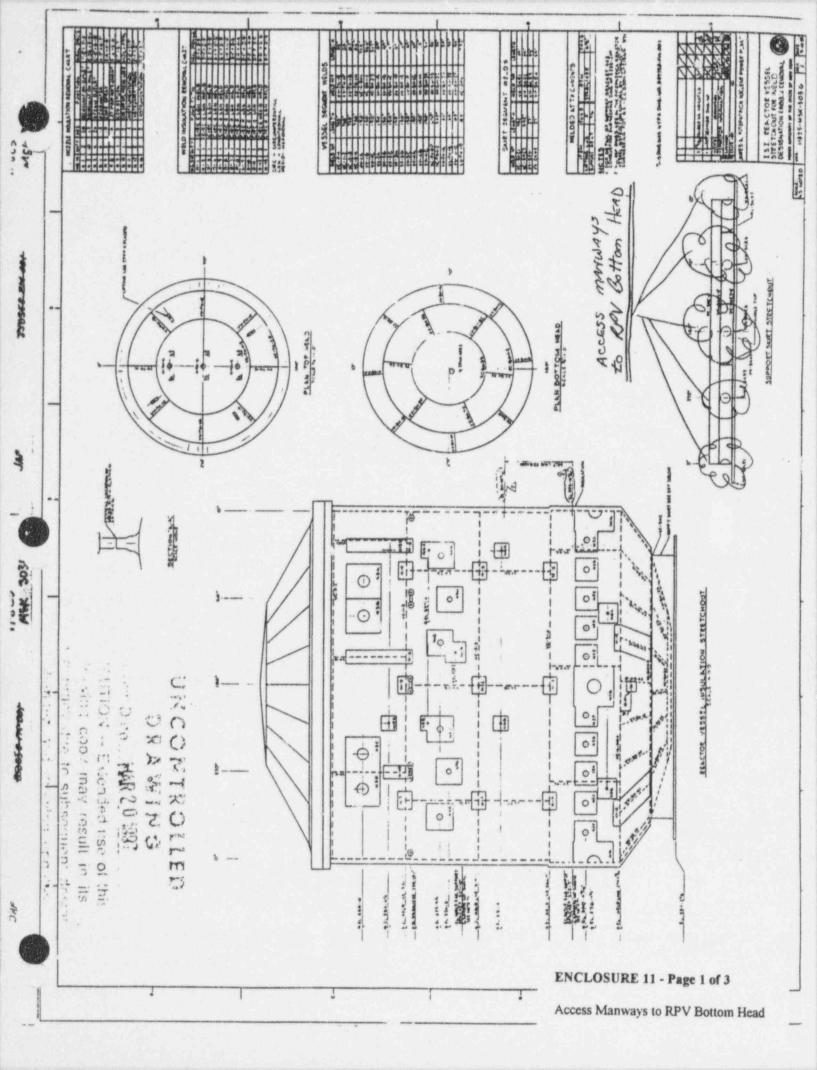
### Proposed Alternative

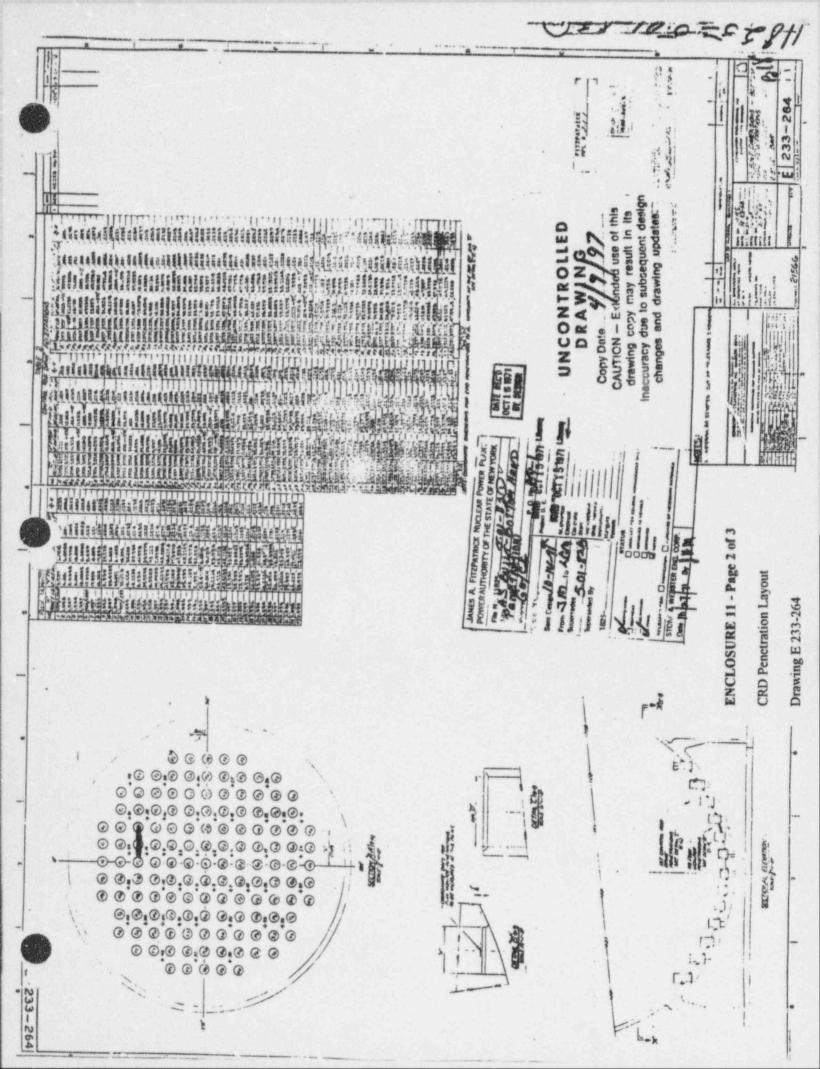
None

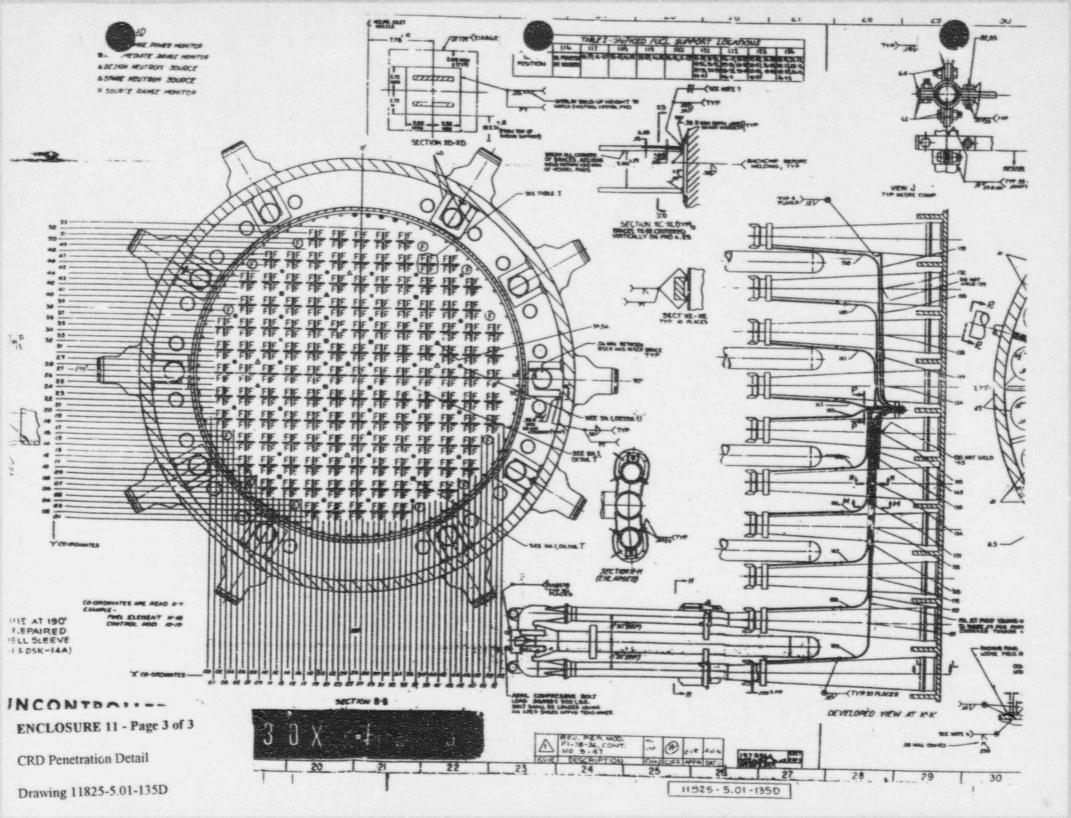


Table 11

Marie Towns of Property and Marie Con-	Coc	le Category B-O / Item No. B	14.10
RPV Bottom Head Penetrations	CRD No.	RPV & Penetration Reference Drawings	CRD Coordinates Reference Drawing
V8	22-51	MSK-3036 & 5.01-82D	5.01-10.7D
Vl	30-51	MSK-3036 & 5.01-82D	5.01-135D
U4	02-27	MSK-3036 & 5.01-82D	5.01-135D
V2	50-31	MSK-3036 & 5.01-82D	5.01-135D
V3	50-23	MSK-3036 & 5.01-82D	5.01-135D
U3	26-03	MSK-3036 & 5.01-82D	5.01-135D
Ul	26-51	MSK-3036 & 5.01-82D	5.01-135D
V7	02-31	MSK-3036 & 5.01-82D	5.01-135D
V6	02-23	MSK-3036 & 5.01-82D	5.01-135D
U2	50-27	MSK-3036 & 5.01-82D	5.01-135D
V4	30-03	MSK-3036 & 5.01-82D	5.01-135D
V5	22-03	MSK-3036 & 5.01-82D	5.01-135D







# **CLASS 2 COMPONENTS**

Code Category C-A: Pressure Retaining Welds in Pressure Vessels

Item No. C1.10 Shell Circumferential Weld (RHR Heat Exchanger)
Item No. C1.30 Tubesheet-to-Shell Weld (RHR Heat Exchanger)

Item No. C1.10 Shell Circumferential Weld (RHR Heat Exchanger)

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(ii) from the full Code-required extent of volumetric examination for RHR Heat Exchanger Pressure Vessel Circumferential Weld # C3-B listed in Table 12.

#### **Examination Requirements**

ASME Section XI requires 100% volumetric examination of this weld once per interval.

#### **Basis For Relief**

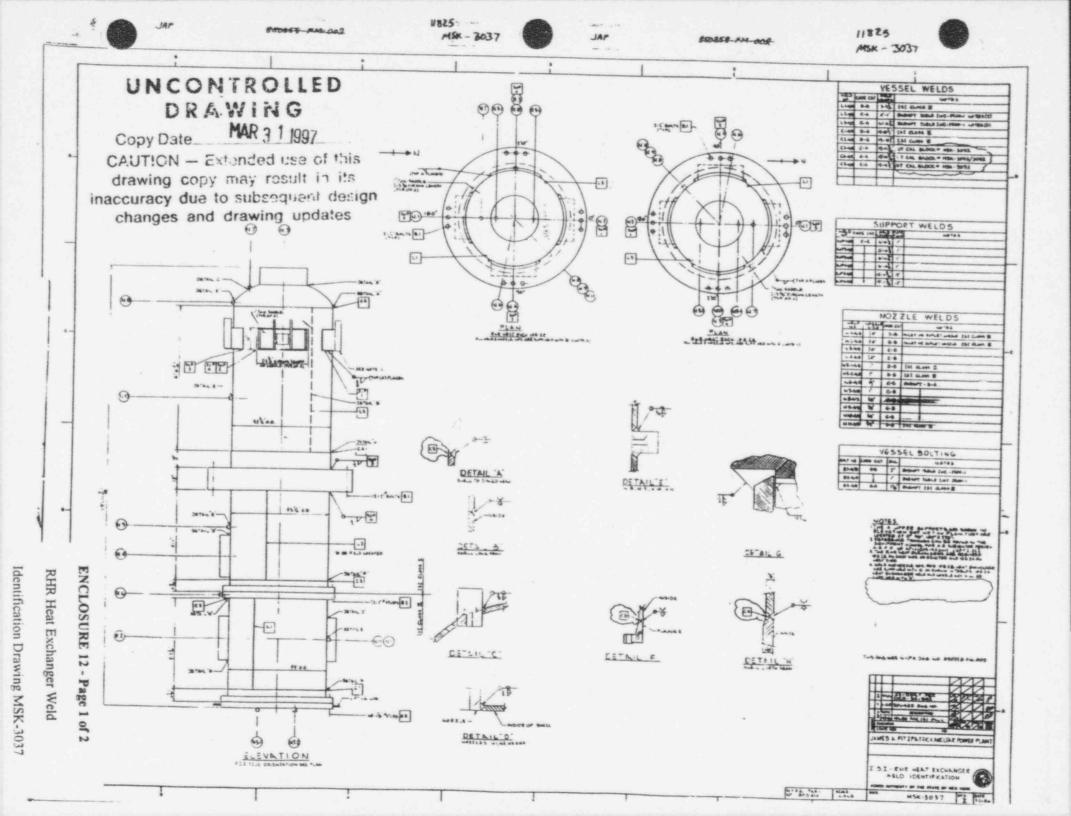
Complete inspection of the Code-required volume is not possible based on restricted access caused by interference due to the close proximity of the vessel flange bolting and the N4B nozzle. Drawings and sketches which illustrate the restricted conditions encountered that limit examination coverage are included in Enclosure 12.

#### **Examination Alternative**

- No additional volumetric examinations will be performed on these welds. The component listed in this relief request has been examined to the maximum extent practical.
- A visual inspection (VT-2) was performed during the pressure testing which is conducted on this component every refuel outage (no leakage detected) in accordance with IWA-5000 and IWC-5000, which provides reasonable assurance of component integrity.

Table 12

Code Category C-A / Item No. C1.10 (RHR Heat Exchanger)						
Composent ID	System	Extent Examined	Limitation	Remarks		
C3-B	RHR Ht. Exch. "B"	Est. 70 - 80% (1)	Flange Bolting & Nozzle	See Enclosure 12		



**EBASCO SERVICES INCORPORATED** IAF. UT-014B every today DATE 3-31-90 SHEET 2 OF 2 CHKD. BY C DATE 41190 OFS NO. . N.Y.P.A PROJECT T.A. FITZ PATRICK "B" C.3-B Ht. Exch. SHR Shell FLANGE Weld # C3-B RHR Ht. Exch. "B" ENCLOSURE 12 - Page 2 of 2 STUBIE NUTS UP AREA NOT COVERED BY TWO DIRECTIONAL Ref. COVERAGE FOR 45° MOZZLE view Facing. EasT Shell Flange

#### Item No. C1.30

#### Tubesheet-to-Shell Weld (RHR Heat Exchanger)

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(ii) from the Code-required extent of volumetric examination for Pressure Retaining Welds in Pressure Vessels for the RHR Heat Exchanger Tubesheet-to-Shell Welds # C2-A & C2-B.

#### **Examination Requirements**

ASME Section XI requires 100% volumetric examination of this weld once per interval.

#### Basis for Relief

Relief from the Code-required volume was requested in the initial 2nd Ten-Year Inservice Inspection Program submittal (Reference NRC Safety Evaluation, dated October 27, 1987, Relief Request (R15). The NRC denied this application for relief based on the possibility of disassembly and inspection during the Interval. The RHR Heat Exchangers have not been disassembled during the 2nd Ten-Year Interval and, therefore, the Authority is re-submitting this request for relief from the Code-required extent of examination for the Tubesheet-to-Shell Welds which was a part of the original Inservice Inspection Program's 2nd Ten-Year submittal.

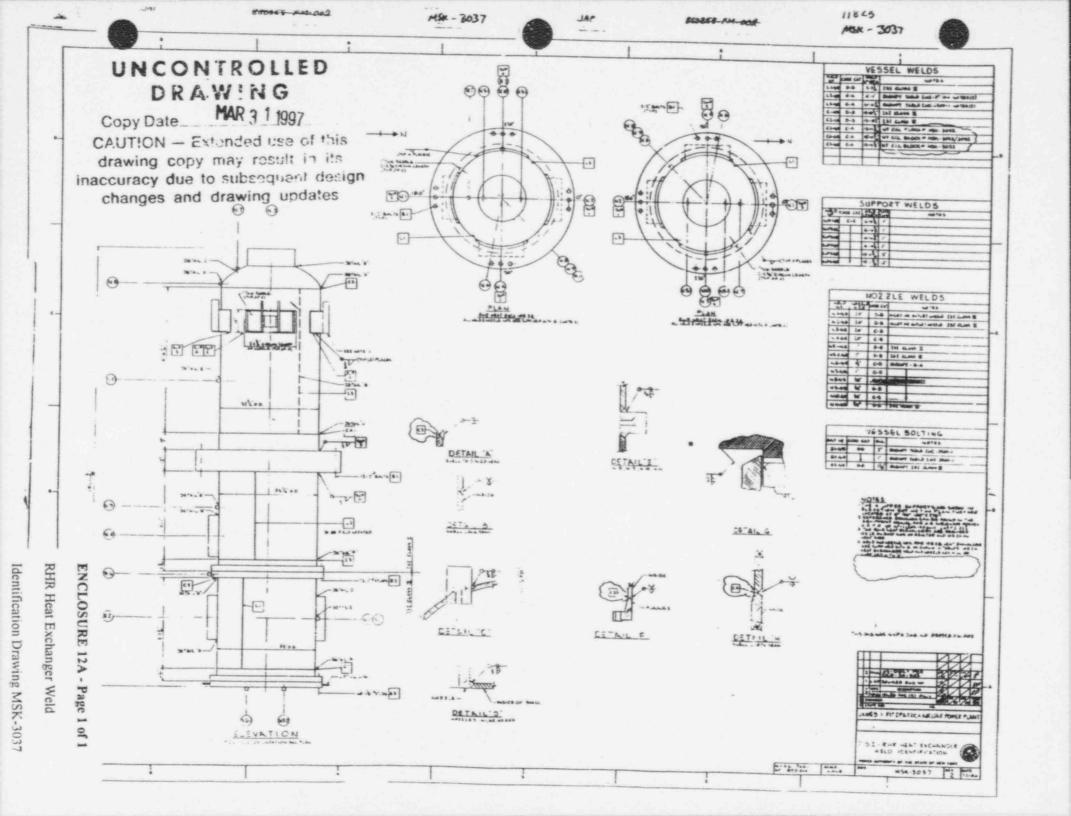
#### **Examination Alternative**

- 1. No additional volumetric examinations will be performed on these welds. The components listed in this relief request have been examined to the maximum extent practical.
- A visual inspection (VT-2) was performed during the pressure test which is conducted on this component every refuel outage (no leakage detected) in accordance with IWA-5000 and IWC-5000.

### TABLE 12A

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# **ENCLOSURE 12A**



Code Category C-A:

Pressure Retaining Welds in Pressure Vessels (SCRAM

TANK)

Item No. C1.20

Head Welds

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of volumetric examination for Pressure Retaining Welds in Pressure Vessels for Scram Tank Head Welds listed in Table 13.

#### **Examination Requirements**

ASME Section XI requires 100% volumetric examination of this weld once per interval.

#### Basis for Relief

Complete inspection of the Code-required volume is not possible based on welded appurtenances on the vessel which restrict accessibility. Drawings and sketches which illustrate the restricted conditions encountered that limit examination coverage are included in Enclosure 13.

#### **Examination Alternative**

- No additional volumetric examinations will be performed on these welds. The components listed in this relief request have been examined to the maximum extent practical.
- A visual inspection (VT-2) was performed during the pressure test which is conducted on this component every refuel outage (no leakage detected) in accordance with IWA-5000 and IWC-5000.

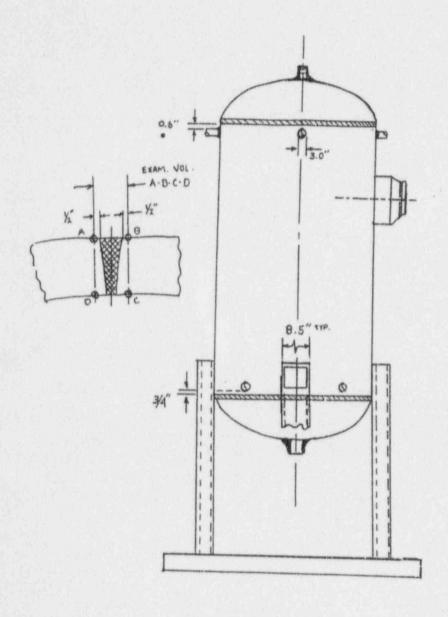
Table 13

	A CONTRACTOR OF THE PARTY OF TH	Code Category C-A / C	1.20 (Scram Tank)	
Component ID	System	Extent Examined	Limitation	Remarks -
TH1-B	Scram Tank	Est. 80 - 85%	(4) Socket Weld Noz(s)	See Enclosure 13
ВН1-В	Scram Tank	Est. 60 -75%	(4) Support Legs	See Enclosure 13

### PRESSURE RETAINING WELDS IN PRESSURE VESSELS

### **EXAMINATION CATEGORY C-A**

### CODE REQUIRED VOLUME



Coverage Achieved for a Specific Weld or Component is Designated in Table 13 - Extent Examined

Code Category C-B:

Pressure Retaining Nozzle Welds in Vessels

(RHR Heat Exchanger)

Item No. C2.21

Nozzle-to-Shell (or Head) Weld

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of volumetric examination for the RHR Heat Exchanger Nozzle-to-Shell (or Head) Welds listed in Table 14.

#### **Examination Requirements**

ASME Section XI requires 100% volumetric and surface examination of this weld once per interval.

#### Basis for Relief

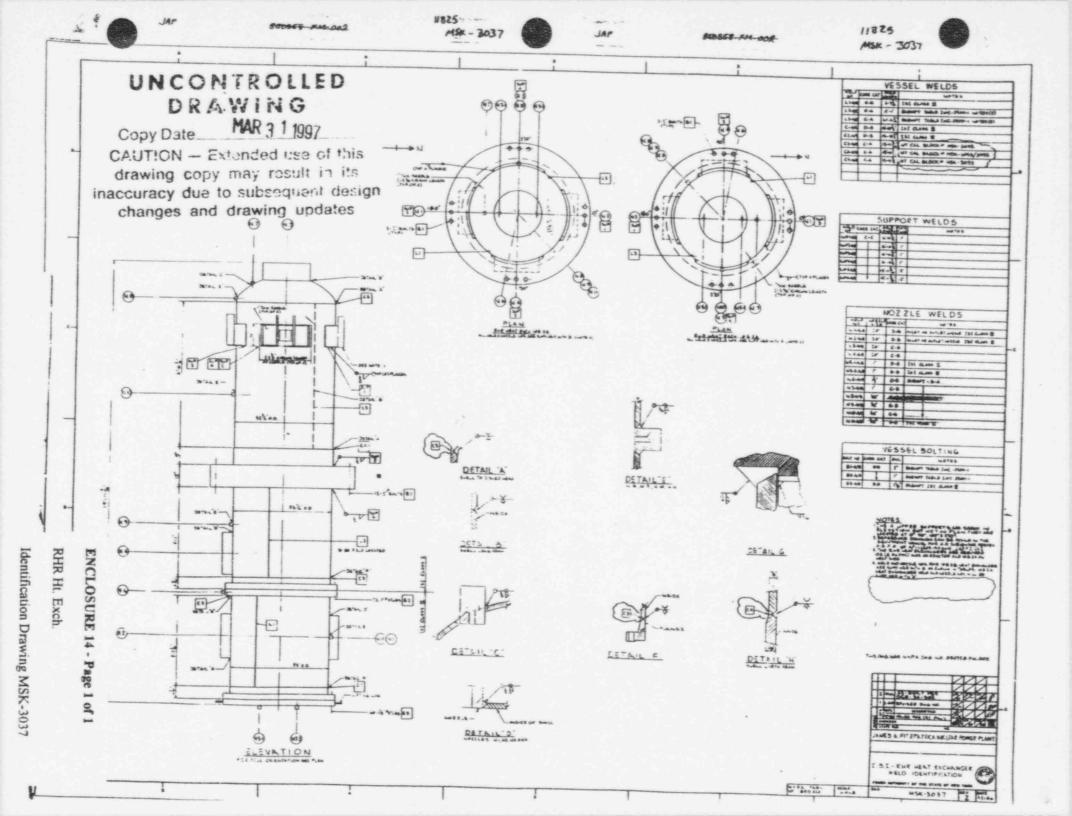
Complete volumetric inspection of the Code-required volume is not possible based on nozzle design and the proximity of the vessel flange and associated bolting. Inspection data performed on these components include sketches which illustrate the restricted conditions encountered that limit the examination coverage. Full examination coverage for the required surface examination was achieved. Drawings and sketches which illustrate the restricted conditions encountered that limit examination coverage are included in Enclosure 14.

#### **Examination Alternative**

- No additional volumetric or surface examinations will be performed on these welds. The components listed in this relief request have been examined to the maximum extent practical.
- A visual inspection (VT-2) was performed during the pressure test which is conducted on this component every refuel outage (no leakage detected) in accordance with IWA-5000 and IWC-5000.

Table 14

Code Category C-B / Item No. C2.21 (RHR Ht. Exch.)							
Component ID	System	Extent Examined	Limitation	Remarks			
N3A	RHR Ht. Exch	Est. 10%	One-sided Configuration	See Enclosure 14			
N4A	RHR Ht. Exch	40-50%	One-sided Configuration	See Enclosure 14			
N4B	RHR Ht. Exch	40-50%	One-sided Configuration	See Enclosure 14			



Code Category C-C: Integral Attachments for Vessels, Piping, Pumps, and Valves

Item No. C3.10 Pressure Vessels (Integrally Welded Attacaments)

Item No. C3.20 Piping (Integrally Welden Attachments)

Item No. C3.10 Pressure Vessels (Integrally Welded Attachments)

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(ii) from the full Code-required extent of surface examination for the RHR Heat Exchanger Pressure Vessels (Integrally Welded Attachments) listed in Table 15.

#### Examination Requirements

ASME Section XI requires 100% surface examination of this weld once per interval.

#### Basis for Relief

Complete inspection of the Code-required surface area utilizing a surface inspection method was not possible based on restricted accessibility due to the interferences of design. These welds are support lugs which are part of the rigid support structure that stabilizes the upper portion of the RHR Heat Exchanger. The lower portion of these lugs are restricted by an attached structural angle member frame which extends beyond the bottom edge of the lugs limiting access to these areas. This limiting condition restricts the access necessary to perform a magnetic particle inspection and the ability to use surface preparation equipment needed to prepare for liquid penetrant testing. In order to obtain full Code examination coverage on these components, it would require removal of the structural angle members and increase radiological exposure which would constitute a hardship and unusual difficulty for the sole purpose of providing access to obtain additional examination coverage. Partial code required coverage was obtained examining components SUP-1A, SUP-2A, SUP-3A, and SUP-4A using magnetic particle, liquid penetrant surface inspection methods and visual examination (VT-1). A visual inspection (VT-2) was performed during the pressure test (no leakage detected) which is conducted on these components every refuel outage in accordance with IWA-5000 and IWC-5000. Drawings and sketches which illustrate the restricted conditions encountered that limit examination coverage are included in Enclosure 15

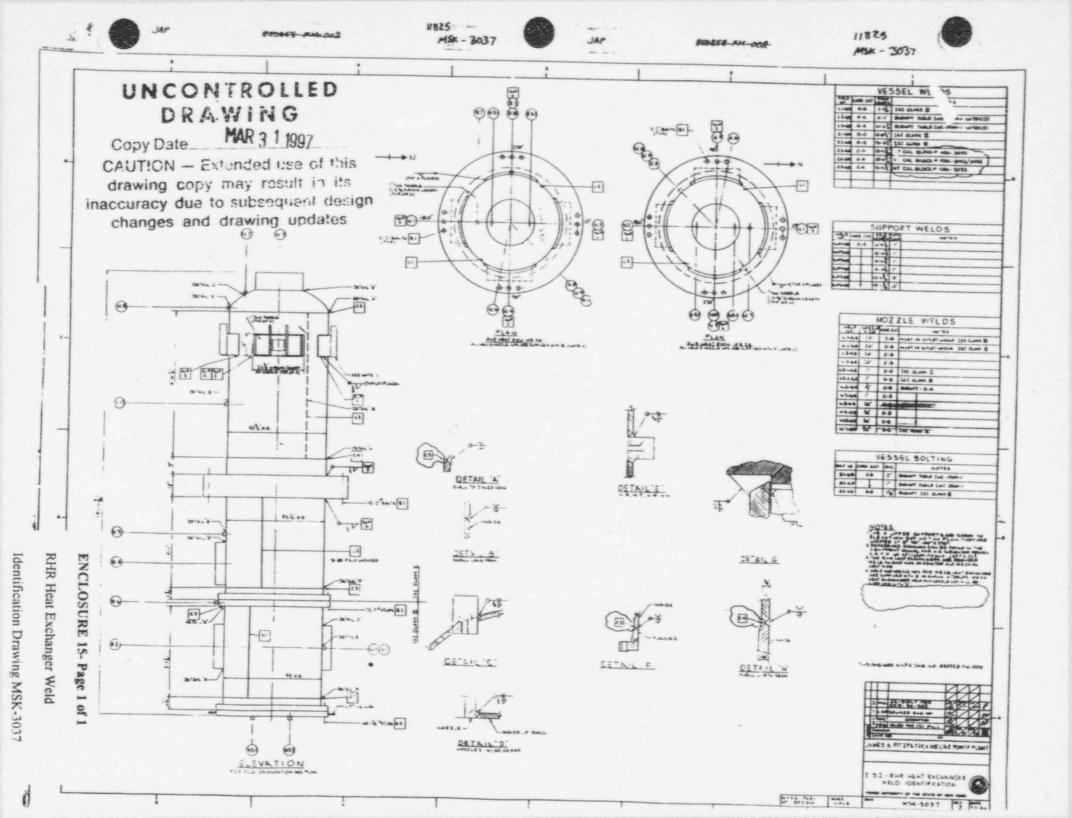
### Proposed Alternative Examination

- 1. A supplemental visual inspection (VT-1) was performed on the inaccessible areas (lower portion) of these welds with no adverse or reportable conditions observed.
- 2. No additional examinations will be performed on these welds. The components listed in this relief request have been examined to the maximum extent practical.

Table 15

Code Category C-C / Item No. C3.10 (Integrally Welded Attachments)							
Component ID	System	Extent Examined	Limitations	Remarks			
SUP-1A	RHR Heat Exchanger	Est. 70%	Whip Restraint Attached to Lug	See Enclosure 15			
SUP-2A	RHR Heat Exchanger	Est. 83%	Whip Restraint Attached to Lug	See Enclosure 15			
SUP-3A	RHR Heat Exchanger	Est. 81%	Whip Restraint Attached to Lug	See Enclosure 15			
SUP-4A	RHR Heat Exchanger	Est. 80%	Whip Restraint Attached to Lug	See Enclosure 15			

Wigner .



#### Item No. C3.20

#### Piping (Integrally Welded Attachments)

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of surface examination for Piping (Integrally Welded Attachments) listed in Table 15A.

#### Examination Requirements

ASME Section XI requires 100% of required areas of each welded attachment.

#### Basis for Relief

Complete inspection of the Code-required surface volume for components listed in Table 15A is not possible based on restricted accessibility caused by interferences due to design limitations and/or support structures encountered when employing the surface inspection methods. Drawings and sketches which illustrate the restricted conditions encountered that limit examination coverage are included in Enclosure 15A.

#### **Proposed Alternative Examinations**

- No additional surface examinations will be performed. These welds have been examined to the maximum extent practical.
- A visual inspection (VT-2) was performed during the pressure test (no leakage detected)
  which is conducted on these components every refuel outage in accordance with IWA5000 and IWC-5000.

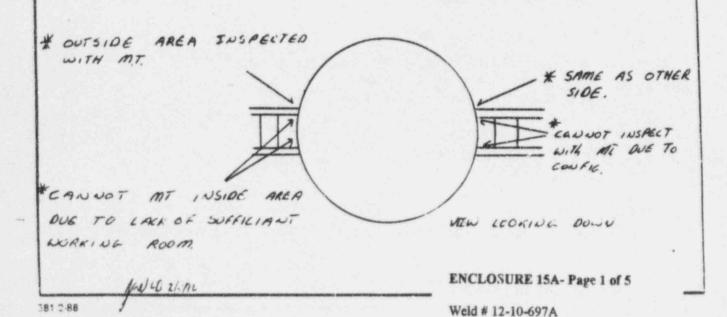
Table 15A

Component ID	System Extent Examined Limitation		Remarks -	
12-10-697A	RHR	Approx. 50% (1)	Design	See Enclosure 15A
8-10-862B	RHR	80-90%	Pipe Support	See Enclosure 15A
20-10-889	RHR	Esst. 75%	Pipe Support	See Enclosure 15A
12-14-750A	Core Spray	86%	Concrete Wall	See Enclosure 15A

NOTE: (1) An approximate percentage of 50% for Code required coverage of Weld 12-10-697A is being used based on the outside surface being accessible for examination

# **ENCLOSURE 15A**

JAF-MT-024 EBASCO SERVICES INCORPORATED BY 6). H. DATE 1-18-92 SHEET 2 OF 2 CHKD. BY CL DATE 2-591 OFS NO.\_\_\_ CLIENT NYPA PROJECT JA FITZPATRICK SUBJECT 12-10-697A PWG # 11825 MSK - 3007 REV 7 AREA INSPECTED BY MIT. CANNOT UET THE INISIDE DUE TO LACK OF SUFFICIENT 7/2" WERKIUL ROUM



SHEET. 2 OF 2 BY S. CROTHERS DATE 1-21-92 CHKD. BY ..... DATE OFS NO ... LENT NYPA ROJECT J A FIT & PATRICK SUBJECT 8-10-862 B LIMITATION INTEGRAL ATTACHMENTS ARE IN CONTACT WITH PIPE SUPPORT MOTE THERE ARE FOUR INTEGRAL ATTACHMENTS ENCLOSURE 15A- Page 2 of 5 LIMITATION Weld # 8-10-862B PIPE SUPPORT CLAMP

#### **EBASCO SERVICES INCORPORATED**

DATA SHEET ..

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#### MATERIALS TESTING AND EXAMINATION SERVICES

#### INSERVICE INSPECTION

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### Raytheon Engineers & Constructors

CHKD. BY 18 DATE 12/3/94

OFS NO. 6/00 SHEET 2 OF 2 OFS NO. 6/00 DEPT. 2542

CLIENT NYPA

PROJECT Fitz patrick 94 Refuel Outage

SUBJECT Insecessable area due to concrete usul

, ""TER DWG. MSK 3022 MO 12-3-94 Comp. 12-14-250 Core epray 750 A Concrete Well 12-14-750B In access to be area due to Conox etc Wall 12-14-7508 Flow Flow

ENCLOSURE 15A- Page 5 of 5

Weld # 12-14-750A

12 5 Tholan 1211 1.3.9 1

Code Category C-F/CG: Pressure Retaining Welds in Pipir Pumps, and Vaives in Systems Which Circulate Reactor Coolant

Item No. C2.1 Piping (Circumferential Butt Welds)
Item No. C2.3 Piping (Branch Pipe-to-Pipe Weld Joints)

Item No. C2.1 Piping (Circumferential Butt Welds)

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of surface and/or volumetric examination for Circumferential Butt Welds listed in Table 16.

#### **Examination Requirements**

ASME Section XI, 1980 Edition through Winter 1981 Addenda, requires the lower 1/st of the weld examined volumetrically up to and including adjacent base metal 1/4" from the weld toe on either side of the weld. Surface examinations requires the weld inspection and includes 1/2" on either side of the weld toe.

#### Basis for Relief

Complete inspection of the Code-required volume for components listed in Table 16 is not possible based on restricted access caused by permanent interference such as saddle welds, and integrally welded supports.

### Proposed Alternative Examination

- No additional volumetric examinations will be performed. These welds have been examined to the maximum extent practical.
- A visual inspection (VT-2) was performed during the pressure test (no leakage detected)
  which is conducted on these components every refuel outage in accordance with IWA5000 and IWC-5000.

Table 16

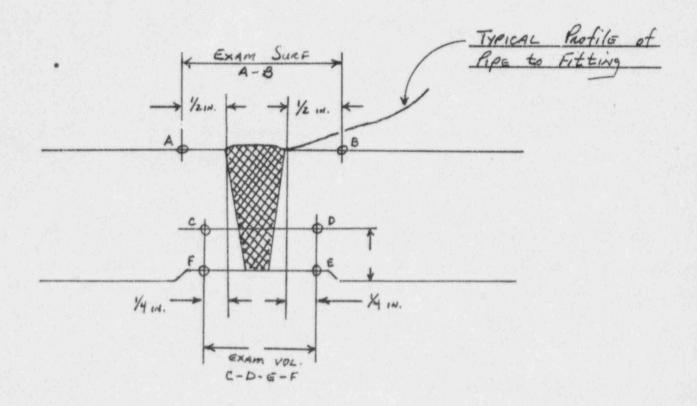
Code Category C-F / Item No. C2.1							
Component ID	System	Extent Examined	Limitation	Remarks			
20-10-227	RHR	50-60%	Saddle Weld Interference	Limitation applies to Sur & Vol. Exams			
16-10-565	RHR	70-80%	Integrally Welded Attachment	Limitation applies to Sur. Exam Only			
16-10-643	RHR	Est. 70-80%	Integrally Welded Attachment	Limitation applies to Sur. Exams Only			
16-10-644	RHR	Est. 70-80%	Integrally Welded Attachment	Limitation applies to Sur. Exams Only			

Welds in Piping

Code Category C-F & C-G

Greater Than 1/2 in, Thickness

Code Required Coverage



Coverage Achieved for a Specific Weld or Component is Designated in Table 16 - Extent Examined

FIGURE 1

Code Category C-G:

Pressure Retaining Welds in Piping, Pumps and Valves in Systems Which Circulate Other Than Reactor Coolant

Item No. C2.3

Branch Pipe-to-Pipe Weld Joints

Relief is requested in accordance with the provisions of 10 CFR 50.55a (a)(3)(iii) from the full Code-required extent of surface and/or volumetric examination for Branch Pipe-to-Pipe Weld Joints listed in Table 1?

#### **Examination Requirements**

ASME Section XI, 1980 Edition through Winter 1981 Addenda, requires the lower 1/st of the weld examined volumetrically up to and including adjacent base metal 1/4" from the weld toe on either side of the weld. Surface examinations requires the weld inspection and includes 1/2" on either side of the weld toe.

#### Basis for Relief

Complete inspection of the Code-required volume for components listed in Table 17 is not possible based on restricted accessibility caused by interference from a socket weld drain line connection and an adjacent support structure.

#### Proposed Alternative Examination

- No additional volumetric examinations will be performed. These welds have been examined to the maximum extent practical.
- A visual inspection (VT-2) was performed during the pressure test (no leakage detected)
  which is conducted on these components every refuel outage in accordance with IWA5000 and IWC-5000.

Table 17

Code Category C-G / Item No. C2.3						
Component ID	System	Extent Examined	Limitation	Remarks		
16-14-709	Core Spray	50% (1)	Adjacent Support Structure	Limitation applies to Surf. Exam Only		
14-23-461	HPCI	Est. 80-90%	4º Socket Weld	Limitation applies to Surf. And Vol. Exams		

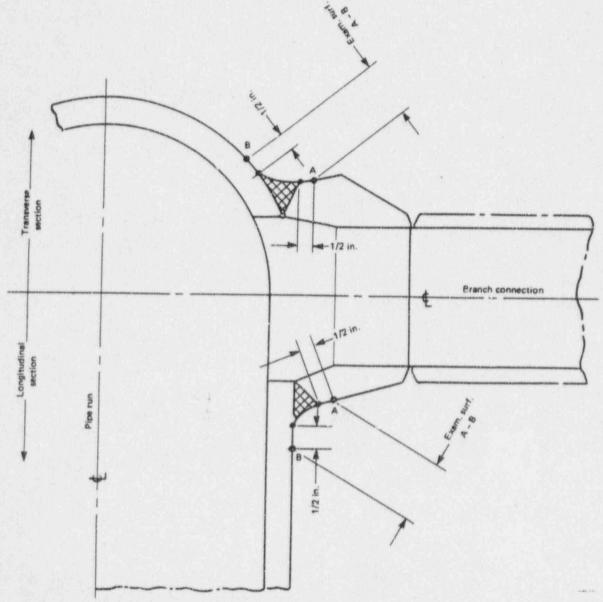
#### NOTE:

<sup>(1)</sup> Credited examination volume of 50% for Weld 16-14-709 is based on a one-sided access inspection. No credit is taken for partial examination coverage on the support structure side of the weld.

### **Branch Connection Welds**

### Code Category C-F & C-G

### Code Required Coverage



Coverage Achieved for a Specific Weld or Component is Designated in Table 17 - Extent Examined

FIGURE 1

Code Category C-H:
Code Category D-A/D-B/D-C:

All Pressure Retaining Components Pressure Retaining Boundary

Item No(s):

All

Relief is requested from the ASME Section XI Code requirements for Code Category C-H and D-A, D-B and D-C for pressure test surveillances that were not completed during the second period of the 2nd ISI Interval. The NRC was previously notified of this discrepancy via Licensee Event Report 92-022.

Pressure testing of the Standby Liquid Control (ISI Class 2), Emergency Service Water (ISI Class 3) and Fuel Pool Cooling (ISI Class 3) systems was not performed during the first inspection period in accordance with the ASME Code edition applicable to the FitzPatrick plant at that time. The pressure tests used 10-minute hold times, recognized by later editions of the Code, instead of the required four-hour hold time. These tests were completed in the 2nd and 3rd periods of the 2nd Interval as required by Code.

Root causes were completed and documented in the 1992 time frame and all pressure tests except those noted above were completed. An assessment was also completed by an outside consultant in late 1995 to ensure all tests scheduled for the remainder of the interval were completed or being tracked to completion. All required tests for Code Categories B-P, C-H and D-A, D-B and D-C have been completed except those noted above.

In addition, the following programmatic improvements were initiated to ensure that no tests would be missed in the future:

- A procedure was developed, Plant Standing Order 31B, which defined responsibilities for the ISI Pressure Test Program. This also included improvements in the Post-Work Test Program, currently AP-19.02.
- A basis document was developed for use by Engineering and Operations personnel which clearly defined the system boundaries for each ISI system. The report # JAF-RPT-MISC-00658 has been revised three times to include guidance for personnel and for the inclusion of various NRC approved relief requests and code cases approved for use in NRC Regulatory Guide 1.147.

In summary, three tests were not completed as required by ASME Section XI Code requirements. Subsequent testing was completed in the 2nd and 3rd periods for these tests. Programmatic improvements have been initiated to prevent recurrence of this event.

Code Category C-H: Code Category D-A/D-B/D-C: All Pressure Retaining Components
Pressure Retaining Boundary

Item No(s):

All

Relief is requested from the ASME Section XI Code requirements for Code Category C-H and D-A, D-B and D-C for pressure test surveillances that were not completed during the second period of the 2nd ISI Interval. The NRC was previously notified of this discrepancy via Licensee Event Report 92-022.

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Root causes were completed and documented in the 1992 time frame and all pressure tests except those noted above were completed. An assessment was also completed by an outside consultant in late 1995 to ensure all tests scheduled for the remainder of the interval were completed or being tracked to completion. All required tests for Code Categories B-P, C-H and D-A, D-B and D-C have been completed except those noted above.

In addition, the following programmatic improvements were initiated to ensure that no tests would be missed in the future:

- A procedure was developed, Plant Standing Order 31B, which defined responsibilities for the ISI Pressure Test Program. This also included improvements in the Post-Work Test Program, currently AP-19.02.
- A basis document was developed for use by Engineering and Operations personnel which clearly defined the system boundaries for each ISI system. The report # JAF-RPT-MISC-00658 has been revised three times to include guidance for personnel and for the inclusion of various NRC approved relief requests and code cases approved for use in NRC Regulatory Guide 1.147.

In summary, three tests were not completed as required by ASME Section XI Code requirements. Subsequent testing was completed in the 2nd and 3rd periods for these tests. Programmatic improvements have been initiated to prevent recurrence of this event.

# ASME SECTION XI LAVO. Containment Repair & Replacement Rule

The Authority submitted a request for relief from the primary containment repair and replacement provisions in the 1992 Edition of ASME Section XI, Subsection IWE on November 26, 1996 (Reference 1). The NRC issued Information Notice 97-29 (Reference 2) to provide guidance to licensees concerning the content of these relief requests. Subsequently, the NRC requested additional information regarding the JAF relief request (Reference 3). The following information supplements Reference 1 and provides the information requested by Reference 3.

Supplement to JAF Relief Request Regarding Implementation Schedule for Containment Repair/Replacement Requirements

#### Explanation of Hardship Imposed By Final Rule

The Authority initially requested (Reference 1) the implementation of the repair and replacement provisions of the 1992 Section XI, Subsections IWE and IWL be deferred by one year from September 9, 1996 to September 9, 1997. A relief from the NRC to defer the implementation of the Code provisions would allow the Authority sufficient time to provide appropriate resources to train necessary personnel and implement a containment repair/replacement program.

The JAF ISI program for Class 1, 2, and 3 components and their supports is based on ASME Section XI, 1980 Edition with Addenda through Winter 1981. The classification of systems and their components is based on requirements in 10 CFR 50.55 (a) and Regulatory Guide 1.26. The 1992 Edition including the Addenda IWE-1220 (d) requires that all piping, pumps, and valves that are part of the containment system, or which penetrate or are attached to the containment vessel, be examined in accordance with the rules of IWB or IWC. This would require the portion of piping systems (up to the first isolation on either side of the containment) that penetrates the containment be upgraded to either ISI Class 1 or Class 2 for the purpose of examination for any repair/replacement activities. Implementation of the rule requires: identification and reclassification of the applicable ISI boundaries for engineering, design and planning personnel (drawing development, preparation, and issuance); revision of applicable plant programs and procedures related to maintenance and modification work packages preparation; and review and/or revision of all work packages prior to the start of the Fall 1996 refueling outage to determine the potential impact of the activity relative to repair and replacement rules implemented by the Code in Subsections IWE and IWL. Since the rule became effective on September 9, 1996, enough time was not available to implement these new provisions prior to the start of the Fall 1996 refueling outage.

Similarly, the ISI program defines the VT-1 and VT-3 examinations and includes all factors necessary to qualify the examiners and assure the examinations are performed to the highest quality levels (in accordance with the ASME Section XI, 1980 Edition up to and including the 1981 Winter Addenda and 1980 Edition of SNT-TC-1A). The imposition of 1992 Code requirements (ANSI/ASNT CP-189, 1991 Edition) for containment would necessitate a separate administrative program including procedures, certification tests and record keeping requirements,

which would merely parallel the existing program with no benefit to quality. The existing program is the same as used on the reactor vessel and other Class 1 components, and continues to prove effective. Implementing and maintaining two separate programs for similar inspections is a significant burden at this time to the Authority, and would not provide a compensatory increase in the level of quality and safety.

The Authority understands that the lack of properly qualified inspectors is an industry-wide situation. Although the qualification of the authorized inspector is the responsibility of the authorized inspection agency, the Authority has encouraged Arkwright (the third party inspection agency for FitzPatrick) to obtain any additional qualification that would be required to implement Subsections IWE and IWL. In the interim, the Authority will continue to address any containment repair (or restoration) issues in accordance with its corrective action program. Experienced individuals will be utilized to inspect, evaluate, and perform the required repair/replacement activities.

JAF entered a refueling outage at the end of October 1996. The date of the final rule, and implementation date, for the containment repair/replacement provisions was September 9, 1996. A revision to the FitzPatrick ASME Section XI Repair/Replacement program prior to the outage to incorporate the provisions of the 1992 ASME Section XI, Subsections IWE and IWL would have had a significant negative impact on the outage schedule. A significant diversion of resources would have been required for: reviewing all outage related modifications and maintenance repair/replacement activities and the thousands of associated outage work packages (many were initiated prior to the issuance of the rule change) for potential impact of the planned activities relative to repair and replacement rules implemented by the Code in Subsections IWE/IWL; training of maintenance, engineering and design personnel; training and qualification of NDE personnel; review, preparation and incorporation of a repair/replacement program to the 1992 Code requirements; and review and revision of ISI class boundary documents (drawing development, preparation and issuance). These activities would have required significant resources, but would not have resulted in a compensatory increase in the level of quality and safety.

The Authority has implemented the following actions toward the development and implementation of a containment repair/replacement program in accordance with the provisions of the 1992 Section XI, Subsections IWE/IWL: a responsible individual from the engineering programs group (ISI Containment Coordinator), QA personnel and civil/structural engineers have attended a training class on the subject Code requirements: action items have been generated and assigned to responsible individuals to incorporate the requirements of IWE/IWL into the JAF ISI program, and to develop a containment repair/replacement program by September 1997 which is contingent on the approval of this Relief Request; and a general walkdown and video taping of the inside exposed surfaces of the containment is planned in preparation for the general visual inspection to be performed prior to September 2001, as required under IWE-1231.

### Proposed Alternative Requirements

The containment, including its components, containment penetrations and the associated process lines that pass through these penetrations up to the first isolation, are designed to QA Category I

and Seismic Class 1 requirements. A listing of the applicable codes and regulations for the primary containment are listed in FSAR Section 16.7.3.2.2. All repair/replacement (R/R) activities, including those for the containment, are controlled by various administrative and implementation procedures. The following are examples of these procedures:

- A) Modification Control Manual Procedures which control the engineering and design processes of plant modifications, such as:
- MCM-3A, Modification Package Preparation Review and Approval,
- MCM-4, Nuclear Safety and Environmental Impact Screens and Nuclear Safety Evaluations;
- MCM-5A, Minor Modification Package Preparation, Review and Approval; and
- MCM-14A, Type 1 Change (JAF).
- B) Station Administrative Procedures (AP) which establish control on the planning, work control, quality assurance, and implementation of work packages associated with the repair/replacement activities, such as:
- AP-05.14, ASME Section XI Repair/Replacement Program;
- AP-10.01, Problem Identification and Work Control;
- AP-10.03, Work Package Planning; and
- AP-18.01, Quality Assurance Program Implementation at JAF.

These proce's, together with other lower level implementation procedures, ensure any containment. A activities meet or exceed the original design criteria. Our QA personnel are also involved with all containment related R/R activities. The examination requirements for containment related repair/replacement activities in many cases are actually more stringent than are required under the provisions of 1992 IWE (VT-1 or VT-3). Therefore, deferral of the implementation date for the repair and replacement provisions of the 1992 ASME Code will not compromise the structural integrity of the containment, and is consistent with maintaining the continued health and safety of the public.

#### References

- NYPA letter, W. J. Cahill, Jr. to NRC (JPN-96-050), "Request for Relief From ASME Section XI Code Regarding Implementation Schedule For Containment Repair/Replacement Requirements," dated November 26, 1996.
- 2. NRC Information Notice 97-29, "Containment Inspection Rule," dated May 30, 1997.
- NRC letter, Karen R. Cotton to James Knubel, "Request for Additional Information Regarding Relief Request From Implementation of 10 CFR 50.55a Related to Containment Repair/Replacement Requirements - James A. FitzPatrick Nuclear Power Plant (TAC No. M98061), dated June 25, 1997.