February 9, 1988

Docket Nos. 50-440

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Mr. Alvin Kaplin, Vice President
Nuclear Group
The Cleveland Electric Illuminating Company
10 Center Road
Perry, Ohio 44081

Dear Mr. Kaplin:

SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT 1, FIRST 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM - REQUEST FOR ADDITIONAL INFORMATION (TAC # 61443)

We have received your March 31, 1987 letter containing the first 10-year interval Inservice Inspection Program for the Perry Nuclear Power Plant, Unit No. 1. We have determined that we will need the additional information identified in the enclosure to this letter in order for us to complete our review. Please provide your response to this request within 60 days of receipt of this letter.

This request for information affects fewer than 10 respondents, therefore, OMB clearance is not required under Pub. L. 96-511.

Sincerely,

/s/

Timothy G. Colburn, Project Manager
Project Directorate III-3
Division of Reactor Projects

Enclosure:
As stated

cc: See next page

Office:	LA/PDIII-3	PM/PDIII-3	PD/PDIII-3
Surname:	PKreutzer	TColburn/tg	KPerkins
Date:	02/9/88	02/9/88	02/9/88

Rec

Rec for

Mr. Alvin Kaplan
The Cleveland Electric
Illuminating Company

cc:
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037

Donald H. Hauser, Esq.
The Cleveland Electric
Illuminating Company
P.O. Box 5000
Cleveland, Ohio 44101

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
Parmly at Center Road
Perry, Ohio 44081

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Frank P. Weiss, Esq.
Assistant Prosecuting Attorney
105 Main Street
Lake County Administration Center
Painesville, Ohio 44077

Ms. Sue Hiatt
OCRE Interim Representative
8275 Munson
Mentor, Ohio 44060

Terry J. Lodge, Esq.
618 N. Michigan Street
Suite 105
Toledo, Ohio 43624

John G. Cardinal, Esq.
Prosecuting Attorney
Ashtabula County Courthouse
Jefferson, Ohio 44047

Eileen M. Buzzelli
The Cleveland Electric
Illuminating Company
P. O. Box 97 E-210
Perry, Ohio 44081

Mr. James W. Harris, Director
Division of Power Generation
Ohio Department of Industrial
Relations
P.O. Box 825
Columbus, Ohio 43216

The Honorable Lawrence Logan
Mayor, Village of Perry
4203 Harper Street
Perry, Ohio 44081

The Honorable Robert V. Orosz
Mayor, Village of North Perry
North Perry Village Hall
4778 Lockwood Road
North Perry Village, Ohio 44081

Attorney General
Department of Attorney General
30 East Broad Street
Columbus, Ohio 43216

Radiological Health Program
Ohio Department of Health
1224 Kinnear Road
Columbus, Ohio 43212

Ohio Environmental Protection
Agency
361 East Broad Street
Columbus, Ohio 43266-0558

Mr. James R. Secor, Chairman
Perry Township Board of Trustees
Box 65
4171 Main Street
Perry, Ohio 44081

State of Ohio
Public Utilities Commission
180 East Broad Street
Columbus, Ohio 43266-0573

Mr. Murray R. Edelman
Centerior Energy
6200 Oaktree Blvd.
Independence, Ohio 44131

ENCLOSURE

Request for Additional Information - First 10-Year Interval Inservice Inspection Program Plan

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) which are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Class 1, Class 2, and Class 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the initial 120-month inspection interval shall comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the date of issuance of the operating license, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of this Code which are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein. The licensee, The Cleveland Electric Illuminating Company, has prepared the Inservice Inspection (ISI) Program Plan to meet the requirements of the 1983 Edition, Summer 1983 Addenda (83S83), of the ASME Code Section XI except that the extent of examination for Code Class 2 piping welds has been determined by ASME Code Case N-408, "Alternative Rules for Examination of Class 2 Piping, Section XI, Division 1."

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

The staff has reviewed the available information in the Perry Nuclear Power Plant, Unit 1, First 10-Year Interval ISI Program Plan, Revision 0, submitted March 31, 1987.

2. Additional Information Required

Based on the above review, the staff has concluded that the following information and/or clarification is required in order to complete the review of the ISI Program Plan:

A. Provide the staff with the Boundary Diagrams which define the ASME Code Class 1, Class 2, and Class 3 boundaries for the systems in the Perry Nuclear Power Plant, Unit 1, First 10-Year Interval ISI Program Plan.

B. It is stated in the ISI Program Plan that the Class 2 pump casing welds will be examined only when the pump is disassembled for repair or service. The licensee is reminded that relief is required prior to the end of the first 10-year inspection interval if the pump casing welds do not receive the Code-required examination.

C. The staff notes that there are welds scheduled for examination in the ISI Program Plan for which the licensee had previously requested relief during preservice inspection (PSI), but has not requested relief for ISI. Instead, the PSI relief requests are referenced in the ISI Program Plan for the first 10-year interval. Because requests for relief are not automatically granted for subsequent inspection intervals, the licensee must make a complete submittal of the requests for relief for each 10-year inspection interval to enable the staff to review the requests for relief against the updated Code requirements. If relief requests are required for the

first 10-year inspection interval, the licensee should submit them for staff review. When preparing requests for relief, the staff suggests that the licensee follow the attached Appendix A, "Inservice Inspection: Guidance for Preparing Requests for Relief from Certain Code Requirements Pursuant to 10 CFR 50.55a(g)(5)."

APPENDIX A

INSERVICE INSPECTION: GUIDANCE FOR PREPARING REQUESTS FOR RELIEF FROM CERTAIN CODE REQUIREMENTS PURSUANT TO 10 CFR 50.55a(g)(5)

A. Description of Requests for Relief

The guidance in this enclosure is intended to illustrate the type and extent of information that is necessary for "request for relief" of items that cannot be fully inspected to the requirements of Section XI of the ASME Code. The inservice inspection program should identify the inspection and pressure testing requirements of the applicable portion of Section XI that are deemed impractical because of the limitation of design, geometry, radiation considerations or materials of construction of the components. The request for relief should provide the information requested in the following section of this appendix for the inspections and pressure tests identified above.

B. Request for Relief From Certain Inspection and Testing Requirements

Many requests for relief from testing requirements submitted by licensees have not been supported by adequate descriptive and detailed technical information. This detailed information is necessary to: (1) document the impracticality of the ASME Code requirements within the limitations of design, geometry and materials of construction of components; and (2) determine whether the use of alternatives will provide an acceptable level of quality and safety.

A relief request submitted with a justification such as "impractical", "inaccessible", or any other categorical basis, require additional information to permit an evaluation of that relief request. The objective of the guidance provided in this section is to illustrate the extent of the information that is required to make a proper evaluation and to adequately document the basis for granting relief in the Safety Evaluation. Subsequent requests for additional information and delays in completing the review can be considerably reduced if this information is provided initially in the licensee's submittal.

For each relief request submitted, the following information should be included:

1. State when the request for relief would apply during the inspection period or interval (i.e., whether the request is to defer an examination.)

2. State the time period for which the requested relief is needed.

3. An itemized list of the specific component(s) and the examination requirement for which relief is requested.

4. The number of items associated with the requested relief.

5. The ASME Code Class, Examination Category, and Item Number(s).

6. An identification of the specific ASME Code requirement that has been determined to be impractical.

7. The information to support the determination that the requirement is impractical; i.e., state and explain the basis for requesting relief. If the Code-required examination cannot be performed because of a limitation or obstruction, describe or provide drawings showing the specific limitation or obstruction, and provide an estimate of the percentage of the Code-required examination that can be completed on the individual components requiring relief.

8. An identification of the alternative examinations that are proposed: (a) in lieu of the requirements of Section XI; or (b) to supplement examinations performed partially in compliance with the requirements of Section XI.

9. State when the proposed alternative examinations will be implemented and performed.

10. A description and justification of any changes expected in the overall level of plant safety by performing the proposed alternative examination in lieu of the examination required by Section XI. If it is not possible to perform alternate examinations, discuss the impact on the overall level of plant quality and safety.

Technical justification or data must be submitted to support the relief request. Opinions without substantiation that a change will not affect the quality level are unsatisfactory. If the relief is requested for inaccessibility, a detailed description or drawing which depicts the inaccessibility must accompany the request. A relief request is not required for tests prescribed in Section XI that do not apply to your facility. A statement of "N/A" (not applicable) or "none" will suffice.

C. Request for Relief for Radiation Considerations

Exposures of test personnel to radiation to accomplish the examinations prescribed in Section XI of the ASME Code can be an important factor in determining whether, or under what conditions, an examination must be performed. A request for relief must be submitted by the licensee in the manner described above for inaccessibility and must be subsequently approved by the NRC staff.

Some of the radiation considerations will only be known at the time of the test. However, from experience at operating facilities, the licensee generally is aware of those areas where relief will be necessary and should submit as a minimum, the following information with the request for relief:

1. The total estimated man-rem exposure involved in the examination.

2. The radiation levels at the test area.

3. Flushing or shielding capabilities which might reduce radiation levels.