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The Northeast Utilities System

October 30, 1998

Docket No. 50-443

NYN-98126

AR#98019275-01

United States Nuclear Regulatory Commission Attention: Document Control Desk Washington, DC 20555

Seabrook Station Inservice Inspection Program Relief Request IR-8 Revision 1

Enclosed, please find Inservice Inspection Program Relief Request IR-8 Revision 1. This relief request is being requested pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the proposed alternative will provide an acceptable level of quality and safety. North Atlantic Energy Service Corporation (North Atlantic) forwarded Revision 0 of this relief request by letter (NYN-98081) dated June 17, 1998. In response to NRC staff questions pertaining to the specific section of the NRC regulations that IR-8 was being requested for, North Atlantic agreed to revise Relief Request IR-8 and submit additional pertinent information to support the revised basis for relief.

North Atlantic requests NRC review and approval of this relief request by December 11, 1998 to support planning and scheduling work scope activities for the upcoming sixth refueling outage (OR06).

Should you require further information regarding this matter, please contact Mr. Terry L. Harpster, Director of Licensing Services at (603) 773-7765.

Very truly yours,

NORTH ATLANTIC ENERGY SERVICE CORP.

Ted C. Feigenbaum

Executive Vice President and

Chief Nuclear Officer

cc: H. J. Miller, NRC Regional Administrator

W. T. Harrison, NRC Project Manager, Project Directorate 1-3

R. K. Lorson, NRC Senior Resident Inspector

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ENCLOSURE 1 TO NYN-98126

North Atlantic Energy Service Corporation Seabrook Unit 1 First Ten-Year Interval

Relief Request Number IR-8 Revision 1

1. Components For Which Relief is Requested:

Thirty Three (33) ASME Class 1 Valves

2. Component ID No's:

See attached list.

- 3. ASME Code Class: 1
- 4. Examination Category: B-M-2, Item B12.50
- 5. Code Requirement:

ASME B&PV Code Section XI, 1983 Edition through Summer 1983 Addenda, Table IWB-2500-1, Item No. B12.50 requires a visual examination (VT-3) of the internal surfaces on valve bodies excee "ng 4" nominal pipe size (NPS).

Examinations are lanited to one valve within each group of valves that are of the same constructional design (such as globe, gate, or check valve) and manufacturing method, and that perform similar functions in the system (such as containment isolation and system overpressure protection).

6. Basis for Relief:

Relief is being requested pursuant to 10CFR50.55a(a)(3)(i) on the basis that the proposed alternative will provide an acceptable level of quality and safety. North Atlantic proposes to utilize the 1989 Edition of the ASME Boiler and Pressure Vessel Code, Section XI, Table IWB-2500-1, Item B12.50 in lieu of the requirements specified in the 1983 Edition (including Addenda through Summer 1983) of Section XI, Table IWB-2500-1, Item B12.50 to perform a visual examination (VT-3) of the subject Class 1 valves.

Compliance with the 1983 Edition of the Code (including Addenda through Summer 1983) would require the disassembly of six Class 1 valves (one valve within each group of valves) during each 10-year inspection interval. Disassembly of the subject valves for the sole

purpose of performing a visual examination (VT-3) of the internal surfaces of the valves is not desirable. The general mechanical and structural condition of the subject valves is periodically monitored. The operational readiness of the subject valves with the exception of RH-V-59, RH-V-61, RH-V-63 and RH-V-65 is verified on a periodic basis by exercising the valves to the open and closed position in accordance with the Seabrook Inservice Test (IST) Program. RH-V-59, RH-V-61, RH-V-63 and RH-V-65 are manual valves which are normally locked open during plant operation and shutdown periods and do not have an active safety function to change position. Seat leakage integrity of the check valves listed on the attached sheet and motor-operated valves RC-V-22, RC-V-23, RC-V-87 and RC-V-88 are periodically leakage tested due to their reactor coolant pressure isolation function in accordance with Seabrook Station Technical Specification 3.4.6.2. Additionally, the structural integrity of the subject valves is assured because they are located within the reactor coolant system pressure boundary and boundary leakage is also required to be monitored during plant operation in accordance with Seabrook Station Technical Specification 3.4.6.2.

As identified in 10 CFR 50.55a(b)(2), the NRC has approved the general use of the 1989 Edition of the ASME Boiler and Pressure Vessel Code, Section XI for inservice inspection activities. Examination of the subject valves in accordance with the requirements outlined in the 1989 Edition of Section XI combined with the operational readiness testing, seat leakage testing and on-line reactor coolant boundary leakage monitoring performed by North Atlantic provides an acceptable alternative to the examination requirements imposed for the subject valves by the 1983 Edition (including Addenda through Summer 1983) of Section XI.

7. Alternative Examination:

North Atlantic will perform a VT-3 visual examination of Class 1 valves as specified in Table IWB-2500-1, Item B12.50 of the 1989 Edition of the ASME Boiler and Pressure Vessel Code, Section XI when a Class 1 valve is disassembled for maintenance, repair or volumetric examination utilizing the non-destructive examination methods and criteria of the 1983 Edition of the ASME Boiler and Pressure Vessel Code, Section XI including Addenda through the Summer of 1983.

8. Implementation Period:

This relief request will be implemented during the 1st 10-Year Inservice Inspection Interval.

Class 1 Valve Grouping

Group No.	System	Valve No.	Description
1	Reactor Coolant	RC-V-22	12" Motor-Operated Gate Valve
		RC-V-23	
		RC-V-87	
		RC-V-88	
2	Reactor Coolant	RC-V-115	6" Safety Valve
		RC-V-116	
		RC-V-117	
3	Residual Heat Removal	RH-V-15	6" Check Valve
		RH-V-29	
		RH-V-30	
		RH-V-31	
		RH-V-52	
		RH-V-53	
		RH-V-50	8" Check Valve
		RH-V-51	
4	Residual Heat Removal	RH-V-59	6" Manual-Operated Gate Valve
		RH-V-61	
		RH-V-63	
		RH-V-65	
5	Safety Injection	SI-V-3	10" Motor-Operated Gate Valve
		SI-V-17	
		SI-V-32	
		SI-V-47	
6	Safety Injection	SI-V-5	10" Check Valve
		SI-V-6	
		SI-V-20	
		SI-V-21	
		SI-V-35	
		SI-V-36	
		SI-V-50	
		SI-V-51	
		SI-V-82	6" Check Valve
		SI-V-87	o check valve
		31-4-07	

ENCLOSURE 2 TO NYN-98126

NRC Commitments Contained in NYN-98126

AR#98019275

Description of Commitment

Assignment 02

Upon NRC approval of ISI Program Relief Request IR-8, Rev. 1, revise the ISI program to perform VT-3 visual examination of class 1 valves as specified in Table IWB-2500-1, Item B12.5 of the 1989 Edition of the ASME B&PV Code when a Class 1 valve is disassembled for maintenance, repair, or volumetric examination in lieu of the 1989 Edition of the Code.