

Duquesne Light Company

Beaver Valley Power Station
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November 3, 1988

JOHN D. SIEBER
Vice President - Nuclear Group

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555


Reference: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Use of Code Cases N-356, N-445, and N-446

Gentlemen:

This letter is being submitted as a follow-up to a recent conversation with members of the NRC staff. We are formally requesting NRC approval to invoke Code Cases N-356, N-445, and N-446 for qualifying NDE personnel at Beaver Valley Power Station, Units No. 1 and No. 2.

Attached please find the technical justification for each of the Code Cases. This request is submitted in accordance with 10CFR50.55a(a)(3). These Code Cases have current NRC approval for use by the industry, and will not affect our present level of quality and safety.

If you have any questions, please contact me or members of my staff.


J. D. Sieber
Vice President
Nuclear Group

Attachments

cc: Mr. J. Beall, Sr. Resident Inspector
Mr. W. T. Russell, NRC Region I Administrator
Mr. P. Tam, Project Manager
Director, Safety Evaluation & Control (VEPCO)

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Attachment

Beaver Valley Power Station, Unit Nos. 1 & 2
Docket No. 50-334, License No. DPR-66
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Case N-356

Certification Period for Level III NDE Personnel
Section XI, Divisions 1, 2, and 3

Inquiry: Is it permissible to extend the certification period for Level III NDE personnel to five years?

Reply: It is the opinion of the Committee that the certification period for Level III NDE personnel may be extended to five years.

Approval Date: July 16, 1982
Reaffirmed: October 23, 1985
Reaffirmed: October 23, 1988
Expiration Date: October 23, 1991
Applicability: 1977 Edition with Winter 1977 Addenda up to and including the 1983 Edition.

Background:

The five year certification period for Level III NDE personnel was originally proposed by ASNT in their internationally recognized Level III Qualification/Certification program. The period was extended from three years to five years due to the complex and comprehensive examinations required to attain Level III status. Code Case N-356 was incorporated into the Code in the Winter 1983 Addenda (and subsequent editions).

Justification:

The 1983 Edition, Winter 1983 Addenda of ASME Section XI, which has been endorsed by 10CFR50 (53FR87, effective May 5, 1988), permits the certification period extension from three to five years. Certification and recertification will still be by examination and all other provisions of IWA-2300 apply.

Attachment

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Case N-445

Use of Later Editions of SNT-TC-1A for Qualification of
Nondestructive Examination Personnel
Section XI, Divisions 1, 2, and 3

Inquiry: May a later edition of SNT-TC-1A than that referenced in
Division 1, 2, or 3 of Section XI be used for qualification
of nondestructive examination personnel?

Reply: It is the opinion of the committee that an edition of
SNT-TC-1A, up to and including the 1984 Edition, later than
that referenced in the Code may be used for qualification of
NDE personnel.

Approval Date: May 7, 1987

Expiration Date: May 7, 1990

Applicability: 1977 Edition with the 1978 Addenda up to and
including 1986 Edition with 1986 Addenda.

Background:

The 1974 Edition of ASME Section XI requires personnel performing NDE
to be qualified in accordance with "SNT-TC-1A" (Ref: IWA-2300). In
the Winter 1975 Addenda, the same requirement was clarified by
specifying "SNT-TC-1A-1975". The Winter 1981 Addenda to the 1980
Code updated the referenced version of TC-1A to "SNT-TC-1A-1980".
This addenda also permitted personnel qualified in accordance with
the 1975 edition of SNT-TC-1A to remain certified until
recertification is required. At that time, recertification was to be
in accordance with the 1980 Edition of SNT-TC-1A. The 1980 Edition
(as modified by para. IWA-2300) has been the referenced ASNT standard
up to the 1986 Addenda, which invokes the 1984 Edition of SNT-TC-1A.

Justification:

The American Society for Nondestructive Testing Recommended Practice
No. SNT-TC-1A, originally published in 1968 has been revised in 1975,
1980 and most recently, in 1984. The revisions have been made to
update training requirements, reference materials and to include
changes in NDE technology. Minimum recommended requirements for
training, experience, qualification, examinations and certifications
have all remained constant or become more stringent during this
evolution of TC-1A. Personnel qualified in accordance with later
editions (as modified by para. IWA-2300 of ASME XI) have had to meet
all of the requirements of the earlier versions and therefore may be
considered "equal to or better" than individuals qualified in
accordance with the 1968 or 1975 editions.

Attachment

Beaver Valley Power Station, Unit Nos. 1 & 2

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Case N-446

Recertification of Visual Examination Personnel

Section XI, Division 1

Inquiry: What alternative rules to those stated in Section XI, Division 1, IWA-2300 may be used for recertification of visual examination personnel?

Reply: It is the opinion of the Committee that in lieu of recertification of visual examination personnel to IWA-2300(d), Level I and II visual examination personnel may be recertified every 3 years by examination only, and Level III visual examination personnel may be recertified by examination every 5 years.

Approval Date: May 7, 1987

Expiration Date: May 7, 1990

Applicability: 1977 Edition with 1978 Addenda up to and including 1986 Edition with 1986 Addenda

Background:

ASME Section XI requires that VT-1 personnel be "trained and qualified to comparable levels of competency by subjection to comparable examinations on the particular method involved". VT-2, VT-3 and VT-4 personnel shall be qualified in accordance with the comparable levels of competency as defined in ANSI N45.2.6-1978.

Justification:

Recertification of Level I and II visual examination personnel every three years (by examination) and recertification of Level III visual examination personnel every five years (by examination) conforms to the guidelines for recertification stated in para. IWA-2300(d) of ASME Section XI 1986 Edition, 1986 Addenda. It is also consistent with the NDE personnel qualification rules stated in Para. IWA-2300(a) of ASME Section XI 1983 Edition, Winter 1983 Addenda (and subsequent editions).