

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY

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July 11, 1986 PY-CEI/NRR-0485 L

MURRAY R. EDELMAN SR. VICE PRESIDENT NUCLEAR

> Dr. W. R. Butler, Director BWR Project Directorate No. 4 Division of BWR Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

> > Perry Nuclear Power Plant Docket Nos. 50-440; 50-441 Preservice Inspection Program

Dear Dr. Butler:

Our letters PY-CEI/NRR-0254 L (June 3, 1985) and 370 L (November 13, 1985) submitted Relief Requests and supporting justification for Class 1 and Class 2 ASME preservice/inservice inspections. Four of these Relief Requests need to be revised, as summarized below. Since the relief requested and justification remain the same, these four relief requests are being submitted as revisions in Attachment 1.

Relief Request #1

Due to obstructions from the bottom head penetrations (CRD bundle) and the skirt knuckle, the bottom head welds (examination items 1-B13-DG and 1-B13-DH) could only be partially examined. They have been added to Relief Request No. 1.

Relief Request #6

During review of the preliminary 10 Year ISI Plan it was discovered that 18 welds were inadvertently left off Table 1 of Relief Request No. 6. Relief Request No. 6 Table 1 is corrected to reflect the addition of these (18) welds.

Relief Request #19

During review and filing of vendor radiographs additional barrel shell and barrel longseam welds were identified on the Byron Jackson RHR, LPCS & HPCS pumps. As with the other barrel welds identified in Relief Request No. 19, these 15 newly identified welds are inaccessible.

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July 11, 1985 PY-CEI/NRR-0485 L

Relief Request #22

The examination item identified in Relief Request No. 22 is for System G33, and should be 1-G33-P132-WA not 1-E22-P132-WA.

A supplement to our Preservice Inspection Program for component supports is also included for your review as Attachment 2 to this letter. This plan identifies those component supports required to be visually examined in accordance with the 1977 Edition of ASME Section XI with all addenda through the summer of 1978. The provisions of IWB and IWC 2200(b)(2) and (3) have been applied to the greatest extent possible (including class 3 component supports); where the provision of the subarticles were not met by construction inspection reports, preservice examinations have been completed. Corresponding procedures are tabulated as IX-INSP-6 for construction inspections, and 80A0184 for preservice inspection.

Pending NRC approval, Attachment 1 revisions will replace those previously submitted and Attachment 2 will be added to the program. A copy of this submittal is also being sent to Mr. Boyd Brown of EG&G Idaho. If you have any questions, plese feel free to all.

Very truly yours,

Murray R. Edeľman Senior Vice President Nuclear Group

MRE:njc

Attachments

cc: Jay Silberg, Esq.
John Stefano (2)
J. Grobe
B. Brown, EG&G Idaho
M. Hum

Attachment 1 PY-CEI/NRR-0485 L

PNPP PRESERVICE INSPECTION PROGRAM

RELIEF REQUESTS

RELIEF REQUEST #1, REV. 1

I. Identification of Components

System: Reactor Pressure Vessel

A. Category: B-A

Component Description: (see attached table for component ID numbers)

Shell welds (Item No. B1.10)
 Head welds (Item No. B1.20)
 Head to flange (Item No. B1.40)

B. Category: B-D

Component Description: (see attached table for component ID numbers)

- 1. Nozzle to vessel welds (Item No. B3.10)
- 2. Nozzle inside radius section (Item No. B3.20)
- C. Category: B-F

Component Description: (see attached table for component ID numbers)

1. Nozzle to safe end welds (Item No. 85.10)

II. ASME B&PV Section XI Requirements

ASME Code requires 100% volumetric examination of welds and required volume.

III. Relief Requested

Relief requested from 100% volumetric examination (see attached table for percent completion of each specific component).

IV. Basis for Relief

The structural integrity of the RPV welds was demonstrated during construction by meeting the requirements of the ASME Code Section III. All welds were inspected in accordance with the appropriate Code requirements, weld techniques and welders were qualified in accordance with Code requirements and materials were purchased and traced in accordance with the appropriate Code and NRC requirements and guidelines. Finally, the pressure boundary received the required hydrostatic test.

Complete examinations meeting the requirements of the ASME Code Section XI were performed on welds of similar configurations which utilized the same weld techniques, procedures and materials. The inspected welds are subject to the same operating and environmental conditions as the partially inspected or uninspected welds. It is, therefore, reasonable to extend the acceptable results on the inspectable welds to the partially inspected or uninspected welds.

Since the construction, operating conditions and environmental conditions on the non-inspected portion of the weld is identical to the inspected area, it is reasonable to extend the satisfactory results to the non-inspected areas.

See attached table for specific cause of the limitation for each component.

V. Alternate Examination

None

SYSTEM: Reactor Pressure Vessel

		CODE	PERCENTAGE COMPLETE			
COMPONENT I.D.	DESCRIPTION	CATEGORY	1	11	BASIS FOR RELIEF	
1-813-AA	Lower head to shell #1 circ. weld	BA	50	50	Examination performed from shell side only due to support skirt and base ring obstruction on lower head.	
1-813-8A	Shell #1 long. seam at 17 ⁰	ВА	70	78	Obstructions presented by N1 and N2 recirculation nozzles.	
1-B13-BB	Shell #1 long. seam at 137	ВА	74	76	Obstructions presented by N2 recirculation nozzles.	
1-B13-BC	Shell ∦1 long. seam at 257	BA	75	75	Obstructions presented by N2 recirculation nozzles.	
1-B13-AB	Shell #1 to shell #2 circ. weld	BA	85	99	Obstructions presented by N1 and N2 recircu- lation nozzles.	
1-B13-BE	Shell ∦2 long. seam at 160 ⁰	ВА	92	90	Obstructions presented by N12 instrumentation nozzle.	
1-B13-AC	Shell #2 to shell #3 circ. weld	BA .	91	100	Obstructions presented by the four N12 instrumentation nozzles on shell #2.	
1-813-8G	Shell #3 long. seam at 79 ⁰	BA	70	75	Obstructions presented by N4 feedwater and N6 RHR/LPCI nozzles.	
1-B13-BJ	Shell #3 long. seam at 199 ⁰	BA	69	68	Obstructions presented by N13 instrumentation and N4 feedwater nozzles.	
1-B13-BK	Shell #3 long. seam at 319 ⁰	BA	88	100	Perpendicular examination obstructed by N4 feedwater nozzle. Complete parallel scan performed.	
1-B13-AD	Shell #3 to shell #4 circ. weld	BA	99	97	Parallel scan could not be performed for approximately 30" along taper between shell #3 and shell #4.	

SYSTEM: Reactor Pressure Vessel

COMPONENT I.D.	DESCRIPTION	CODE		NTAGE PLETE	BASIS FOR RELIEF
1-813-8N	Shell #4 long. seam at 48 ⁰	ВА	64	69	Obstruction presented by N3 main steam nozzle and mechanical limits of scanner.
1-B13-BP	Shell #4 long. seam at 168	BA	85	88	Perpendicular examination obstructed by N16 vibration instrumentation nozzle, N14 instrumentation nozzle and mechanical limits of scanner. Parailel examination obstructed by N14 and mechanical limits of scanner.
1-B13-BR	Shell #4 long. seam at 288	BA	89	86	Obstructions presented by N3 main steam nozzl and mechanical limits of scanner.
1-813-N1A-KA	Nl nozzle to shell weld	BD	89	46	<pre>*Scan path obstructed by nozzle geometry and mechanical limits of scanner.</pre>
1-813-N1A-IR	Nl nozzle inner radius area	BD	92	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.
1-813-N18-KA	Nl nozzle to shell weld	BD	83	10	*Scan path obstructed by nozzle geometry and mechanical limits of scanner.
1-813-N18-IR	Nl nozzle inner radius area	BD	92	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.
1-B13-N2A-KA	N2 nozzle to shell weld	BD	65	36	*Scan path obstructed by nozzle geometry bio- wall doors and mechanical limits of scanner.
1-813-N2A-IR	N2 nozzle inner radius area	BD	88	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.
1-B13-N2A-KB	N2 nozzle to safe-end weld	BF	55	75	Scan path obstructed by nozzle geometry and permanent vessel track at 20 [°] Az.
1-813-N2B-KA	N2 nozzle to shell weld	BD	86	49	<pre>*Scan path obstructed by nozzle geometry and mechanical limits of scanner.</pre>
1-813-N28-IR	N2 nozzle inner radius area	BD	88	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.

*Perpendicular weld examination limited to one direction toward nozzle centerline.

1-B13-N2E-KB

1-813-N2F-KA

SYSTEM: Reactor	Pressure Vessel	CODE	PERCE	NTAGE	
COMPONENT I.D.	DESCRIPTION	CATEGORY	T	11	BASIS FOR RELIEF
1-B13-N2B-KB	N2 nozzle to safe end weld	BF	74	87	Scan path obstructed by nozzle geometry and OD weld contour.
1-813-N2C-KA	N2 nozzle to shell weld	BD	86	74	*Scan path obstructed by nozzle geometry, N9 jet pump instrumentation nozzle and mechanical limits of scanner.
1-813-N2C-1R	N2 nozzle inner radius area	BD	86	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2 and N9 jet pump instrumentation nozzle.
I-BI3-N2C-KB	N2 nozzle to safe end weld	BF	22	75	Scan path obstructed by nozzle geometry and OD weld contour.
1-B13-N2D-KA	N2 nozzle to shell weld	BD	72	46	*Scan path obstructed by nozzle geometry, N9 jet pump instrumentation nozzle, permanent vessel tracks at 110° and 135° Az., and mechanical limits of scanner.
1-B13-N2D-1R	N2 nozzle inner radius area	BD	86	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2 and N9 jet pump instrumentation nozzle.
1-B13-N2D-KB	N2 nozzle to safe end weld	BF	47	100	Scan path obstructed by nozzle geometry and OD weld contour.
1-B13-N2E-KA	N2 nozzle to shell weld	BD	73	67	*Scan path obstructed by nozzle geometry, per- manent vessel track at 135° Az. and mechanical limits of scanner.
1-B13-N2E-IR	N2 nozzle inner radius area	BD	88	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.

*Perpendicular weld examination limited to one direction toward nozzle centerline.

weld

end weld

N2 nozzle to safe

N2 nozzle to shell

BF

BD

75

87

88

37

Scan path obstructed by nozzle geometry.

limits of scanner.

*Scan path obstructed by nozzle geometry, permanent vessel track at 200° Az. and mechanical

PAGE 3 OF 8

SYSTEM: Reactor Pressure Vessel

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COMPONENT I.D.	DESCRIPTION	CATEGORY		II	BASIS FOR RELIEF
1-B13-N2F-IR	N2 nozzle inner radius area	BD	88	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.
1-B13-N2F-KB	N2 nozzle to safe end weld	BF	12	85	Scan path obstructed by nozzle geometry and OD weld contour.
1-В13-N2G-КА	N2 nozzle to shell weld	BD	83	37	*Scan path obstructed by nozzle geometry and mechanical limits of scanner.
1-813-N2G-1R	N2 nozzle inner radius area	BD	88	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.
1-813-N2G-KB	N2 nozzle to safe end weld	BF	24	97	Scan path obstructed by nozzle geometry and OD weld contour.
1-B13-N2H-KA	N2 nozzle to shell weld	BD	89	37	*Scan path obstructed by nozzle geometry, N9 jet pump instrumentation nozzle and mechanical limits of scanner.
1-B13-N2H-IR	N2 nozzle inner radius area	BD	86	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2 and jet pump instrumentation nozzle.
1-в13-м2н-кв	N2 nozzle to safe end weld	BF	57	97	Scal path obstructed by nozzle geometry and OD weld contour.
1-B13-N2J-KA	N2 nozzle to shell weld	BD	88	53	<pre>*Scan path obstructed by nozzle geometry, N9 jet pump instrumentation nozzle and mechanical limits of scanner.</pre>
1-813-N2J-IR	N2 nozzle inner radius area	BD	86	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2 and jet pump instrumentation nozzle.
1-B13-N2J-KB	N2 nozzle to safe end weld	BF	83	88	Scan path obstructed by nozzle geometry.
1-B13-N2K-KA	N2 nozzle to shell weld	BD	86	46	*Scan path obstructed by nozzle geometry, permanent vessel track at 340° Az. and mechanica limits of scanner.
*Perpendicular we direction toward	Id examination limited nozzle centerline.	to one			

PAGE 5 CF 8

SYSTEM: Reactor Pressure Vessel

		CODE	PERC	1PLETE	
COMPONENT I.D.	DESCRIPTION	CATEGORY	<u> </u>	11	BASIS FOR RELIEF
1-813-N2K-1R	N2 nozzle inner radius area	BD	88	N/A	Shell side (Zone I) examination limited by taper between shell #1 and shell #2.
1-813-N2K-KB	N2 nozzle to safe end weld	BF	74	88	Scan path obstructed by nozzle geometry.
1-B13-N4A-KA	N4 nozzle to shell weld	BD	97	32	*Scan path obstructed by nozzle geometry.
1-813-N4A-IR	N4 nozzle inner radius area	BD	96	N/A	Shell side (Zone I) examination limited by N13 instrumentation nozzle at 15 ⁰ Az.
1-813-N4A-KB	N4 nozzle to safe end weld	BF	87	100	Scan path obstructed by nozzle geometry.
1-813-N48-КА	N4 nozzle to shell weld	BD	99	59	*Scan path obstructed by nozzle geometry.
1-813-N48-KB	N4 nozzle to safe end weld	BF	77	98	Scan path obstructed by nozzle geometry.
1-813-N4C-KA	N4 nozzle to shell weld	BD	93	32	*Scan path obstructed by nozzle geometry.
1-813-N4C-IR	N4 nozzle inner radius area	BD	96	N/A	Shell side (Zone I) examination limited by N13 instrumentation nozzle at 165 ⁰ Az.
1-В13-N4С-КВ	N4 nozzle to safe end weld	BF	83	98	Scan path obstructed by nozzle geometry.
1-813-N40-KA	N4 nozzle to shell weld	BD	83	32	*Scan path obstructed by nozzle geometry and permanent vessel track at 200° Az.
1-813-N4D-1R	N4 nozzle inner radius area	BD	96	N/A	Shell side (Zone I) examination limited by N13 instrumentation nozzle at 195° Az.
1-813-N4D-KB	N4 nozzle to safe end weld	BF	83	98	Scan path obstructed by nozzle geometry.

*Perpendicular weld examination limited to one direction toward nozzle centerline.

SYSTEM: Reactor Pressure Vessel

		CODE	PERC	PLETE	
COMPONENT I.D.	DESCRIPTION	CATEGORY			BASIS FOR RELIEF
1-813-N4E-KA	N4 nozzle to shell weld	BD	98	59	*Scan path obstructed by nozzle geometry.
1-B13-N4E-KB	N4 nozzle to safe end weld	BF	80	98	Scan path obstructed by nozzle geometry.
1-B13-N4F-KA	N4 nozzle to shell weld	BD	97	59	☆Scan path obstructed by nozzle geometry.
1-813-N4F-IR	N4 nozzle inner radius area	BD	96	N/A	Shell side (Zone I) examination limited by N13 instrumentation nozzle at 345° Az.
1-813-N4F-KB	N4 nozzle to safe end weld	BF	79	73	Scan path obstructed by nozzle geometry and OD weld contour.
1-в13-N5А-КА	N5 nozzle to shell weld	Bu	98	61	*Scan path obstructed by nozzle geometry.
1-B13-N5A-KB	N5 nozzle to safe end weld	BF	86	100	Scan path obstructed by safe end transition taper.
1-B13-N5B-KA	N5 nozzle to shell weld	BD	98	29	*Scan path obstructed by nozzle geometry.
1-813-N58-KB	N5 nozzle to safe end weld	BF	86	100	Scan path obstructed by safe end transition taper.
1-B13-N6A-KA	N6 nozzle to shell weld	BD	95	56	*Scan path obstructed by nozzle geometry.
1-813-N6A-KB	N6 nozzle to safe end weld	BF	91	100	Scan path obstructed by nozzle geometry and safe end transition taper.
1-B13-N6B-KA	N6 nozzle to shell weld	BD	93	70	*Scan path obstructed by nozzle geometry.

*Perpendicular weld examination limited to one direction toward nozzle centerline. PAGE 6 OF 8

SYSTEM: Reactor Pressure Vessel

PERCENTAGE CODE COMPLETE COMPONENT I.D. CATEGORY DESCRIPTION BASIS FOR RELIEF 1 11 1-B13-N6B-KB N6 nozzle to safe BF 93 74 Scan path obstructed by nozzle geometry, safe end weld end transition taper and OD weld contour. 1-B13-N6C-KA N6 nozzle to shell 95 BD 56 *Scan path obstructed by nozzle geometry. weld 1-B13-N6C-KB N6 nozzle to safe 82 Scan path obstructed by nozzle geometry, safe BF 95 end weld end transition and OD weld contour. 1-B13-AG Top head to top 50 BA 50 Scan path restricted to top head side only. head flange weld 1-813-AH Top head dollar plate Scan path obstructed by four lifting lugs at 0° , 90° , 180° , and 270° Az. BA 96 100 to side plate weld 1-813-N7-KA N7 head spare nozzle BD 89 100 *Scan path obstructed by N8 head spray nozzle. to top head weld 1-B13-N7-IR N7 head spare BD 94 N/A Shell side (Zone I) examination limited by nozzle inner radius N8 head spray nozzle. area 1-813-N8-KA N8 head spray nozzle BD 89 *Scan path obstructed by N7 head spare nozzle. 100 to shell weld 1-813-N8-IR N8 head spray BD 94 N/A Shell side (Zone I) examination limited by nozzle inner radius N7 head spare nozzle. area 1-B13-N9A-KA N9 nozzle to shell 81 *Scan path obstructed by N2 recirculation inlet nozzles at 90° and 120° Az. BD 100 weld Shell side (Zone 1) examination limited by N2 recirculation inlet nozzles at 90° and 120° Az. 1-B13-N9A-IR N9 nozzle inner BD 96 N/A radius area 1-B13-N9B-KA N9 nozzle to shell *Scan path obstructed by N2 recirculation inlet nozzles at 270° and 300° Az. 81 BD 100 weld 1-813-N98-IR N9 nozzle inner Shell side (Zone I) examination limited by N2 recirculation inlet nozzles at 270° and 300° Az. BD 96 N/A radius area

*Perpendicular weld examination limited to one direction toward nozzle centerline. PAGE 7 OF 8

SYSTEM: Reactor Pressure Vessel

COMPONENT I.D.	DESCRIPTION	CODE	PERCENTAGE COMPLETE	BASIS FOR RELIEF
1-813-N15-KA	Bottom head to N15 nozzle	BD	0	Obstruction presented by CRD tube bundle.
1-813-N15-IR	N15 nozzle inner radius	BD	0	Obstruction presented by CRD tube bundle.
1-B13-DG	Bottom Center Plate to Side Plates, 270° Side	ВА	29	Obstruction presented by CRD tube bundle and skirt knuckle.
1-B13-DH	Bottom Center Plate to Side Plates, 270° Side	ВА	29	Obstruction presented by CRD tube bundle and skirt knuckle.

1

RELIEF REQUEST #6 REV. 1

I. Identification of Components

Class 1, Category B-J, item B9.10, piping welds 4 inches NPS and greater (see attached table for ID numbers).

II. ASME B&PV Section XI Requirements

Table IWB-2500-1, Category B-J, item B9.10 requires a surface and volumetric examination.

III. Relief Requested

Relief is requested from the required volumetric examination because techniques have not been developed to complete the examination.

IV. Basis for Relief

Ultrasonic examinations conducted on welds in the recirculation loops which were inlayed and overlayed with corrosion resistant cladding required specialized techniques. Typical techniques identified in Appendix III of Section XI proved to be ineffective. To overcome the metallurgical properties impeding conventional shear wave ultrasonic transmission, refracted longitudinal wave examinations were employed. The accoustic properties of refracted longitudinal wave propagation limit the technique to 1/2 wee path exclusively. The Code required volume necessitates a full wee path through the weld and required volume. Therefore, when access to a butt weld was limited to one side only due to component geometry (e.g. pipe to valve) the perpendicular examination is considered to be 50% complete only.

V. Alternate Examination

None

ELIEF REQUEST NO	. 6 Rev. 1	-+	+	PAGE
WELD OR COMP. ID NUMBER	I SYSTEM	CONFIGURATION	 NATURE OF OBSTRUCTION 	EST. Z COMPLETE IF NOT 1002
-B33-0007	-+	22" VALVE B33-F023A TO PIPE	GEOMETRY	AXIAL 50%
-B33-0022	RR	24" PIPE TO VALUE B33-F06 7A	GEOMETRY	AXIAL 504
-B33-0023	RR	24" VALVE B33-F067A TO PIPE	GEOMETRY	AXIAL 502
-B33-0027	RR	16" CAP TO PIPE	GEOMETRY	AXIAL 952
-B33-0031	RR	16" CROSS TO PIPE	GEOMETRY	AXIAL 504
-833-0034	RR	16" PIPE TO CAP	GEOMETRY	AXIAL 99%
B33-0035	RR	16" X 12" SWEEPOLET TO 12"PIPE	GEOMETRY	AXIAL 50%
B33-0038	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 50%
-833-0040	RR	16" X 12" SWEEPOLET TO 12"PIPE	GEOMETRY	AXIAL 502
-833-0043	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 50%
-B33-0046	RR	24" X 12" REDUCER TO 12" PIPE	GEOMETRY	AXIAL 502
-B33-0049	RR	12" PIPE TO NOZZLE	GEOMETRY '	AXIAL 50%
-833-0054	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 50%
-B33-0056	RR	16" X 12" SWEEPOLET TO 12"PIPE	GEOMETRY	AXIAL 50%
-B33-0059	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 502
-833-0085	RR	24" VALVE TO PIPE	GEOMETRY	AXIAL 50%

TABLE 1

TABLE 1 RELIEF REQUEST NO. 6 Rev. 1

PAGE 2 OF 3

WELD OR COMP. ID NUMBER	I SYSTEM	 CONFIGURATION	I NATURE OF OBSTRUCTION	EST. Z COMPLETE
	i -+	i +	i +	
1-в33-0089	RR	16" PIPE CAP TO PIPE	GEOMETRY	AXIAL 982
1-в33-0096	RR	16" PIPE TO CAP	GEOMETRY	AXIAL 85.9%
1-833-0100	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 50%
1-B33-0105	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL SOL
L-B33-0108	RR	24" X 12" REDUCER TO 12" PIPE	GEOMETRY	AXIAL 50%
1-взз-0111	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 502
I-B33-0113	RR	16" X 12" SWEEPOLET TO 12"PIPE	GEOMETRY	AXIAL 50%
1-взз-0116	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 50%
1-в33-0118	RR	16" X 12" SWEEPOLET TO 12"PIPE	GEOMETRY	AXIAL 50%
I-B33-0121	RR	12" PIPE TO NOZZLE	GEOMETRY	AXIAL 50%
-B33-0006	RR	22' ELBOW TO VALVE FO23A	GEOMETRY	AXIAL 50%
-B33-0012	RR	22" L'LBOW TO PUMP COOIA	GEOMETRY	AXIAL 50%
I-B33-0014	RR	24" PIPE TO PUMP COOIA	GEOMETRY	AXIAL 50%
-B33-0018	RR	24" PIPE TO VALVE FOGOA	GEOMETRY	AXIAL 50%
-B33-0019	RR	24" VALVE FOGOA TO PIPE	GEOMETRY	AXIAL 50% .
I-B33-0026	RR	24" PIPE TO 24" x 16" CROSS	GEOMETRY	AXIAL 50%

RELIEF REQUEST NO	LIEF REQUEST NO. 6 Rev. 1 PAGE 3				
WELD OR COMP. ID NUMBER	I SYSTEM	CONFIGURATION	NATURE OF OBSTRUCTION	BST. Z COMPLETE	
1-B33-0051	RR	16" x 12" SWEEPOLET TO 12" PIPE	GEOMETRY	AXIAL 50%	
1-B33-0068	RR	22" ELBOW TO VALVE FO23B	GEOMETRY	AXIAL 50%	
1-B33-0069	RR	22" VALVE F023B TO PIPE	GEOMETRY	AXIAL 50%	
1-B33-0074	RR	22" ELBOW TO PUMP COO1B	GEOMETRY	AXIAL 50%	
1-B33-0076	RR	24" PIPE TO PUMP COO1B	GEOMETRY	AXIAL 50%	
1-B33-0080	RR	24" PIPE TO VALVE F060B	GEOMETRY	AXIAL 50%	
1-B33-0081	RR	24" VALVE FOGOB TO PIPE	GEOMETRY	AXIAL 50%	
1-B33-0084	RR	24" PIPE TO VALVE F067B	GEOMETRY	AXIAL 50%	
1-B33-0088	RR	24" PIPE TO 24" x 16" CROSS	GEOMETRY	AXIAL 50%	
1-B33-0093	RR	24" x 16" CROSS TO 16" PIPE	GEOMETRY	AXIAL 50%	
1-B33-0097	RR	16" x 12" SWEEPOLET TO 12" PIPE	GEOMETRY .	AXIAL 50%	
1-B33-0102	RR	16" x 12" SWEEPOLET TO 12" PIPE	GEOMETRY	AXIAL 50%	

TABLE 1

RELIEF REQUEST #19 Rev. 1

I. Identification of Components

Class 2, Category C-G, item C6.10, pump casing welds (see attached table for ID numbers).

II. ASME B&PV Section XI requirements

Table IWC-2500-1 Category C-G, item No. C6.10 requires a surface examination.

III. Relief Requested

Relief from the required surface examination is requested because the pump barrel is below the floor level making the welds inaccessible.

IV. Basis for Relief

The structural integrity of the pump pressure boundary was demonstrated during construction by meeting the requirements of the ASME Code Section III. All welds were inspected in accordance with the appropriate Code requirements, weld techniques and welders were qualified in accordance with Code requirements and materials were purchased and traced in accordance with the appropriate Code and NRC requirements and guidelines. Finally, the pressure boundary received the required hydrostatic test.

V. Alternate Examination

None

TABLE 1 DELTER DEMURCT NO. 10 P.

OF 2

CELIEF REQUEST NO	• 19 Nev. 1		PAGE		
WELD OR COMP. I ID NUMBER	 System 	CONFIGURATION	NATURE OF OBSTRUCTION	EST. Z COMPLETE	
1-E22-C001-001	HPCS	PUMP HEAD TO SHELL WELD	INACCESSIBLE	0 X	
1-E22-C001-002	HPCS	PUMP SHELL TO SHELL WELD	INACCESSIBLE	oz	
1-E22-C001-003	HPCS	PUMP SHELL TO SHELL WELD	INACCESSIBLE	02	
1-E22-C001-004	HPCS	PUMP SHELL TO FLANGE WELD	INACCESSIBLE	02	
1-E21-C001-001	LPCS	PUMP HEAD TO SHELL WELD	INACCESSIBLE	02	
1-E21-C001-002	LPCS	PUMP SHELL TO SHELL WELD	INACCESSIBLE	02	
1-E21-C001-003	LPCS	PUMP SHELL TO FLANGE WELD	INACCESSIBLE	02	
1-E12-C002A-001	RHR	PUMP HEAD TO SHELL WELD	INACCESSIBLE	02	
1-E12-C002A-002	RHR	PUMP SHELL TO SHELL WELD	INACCESSIBLE	02	
1-E12-C002A-003	RHR	PUMP SHELL TO FLANGE WELD	INACCESSIBLE	02	
1-E12-C002C-001	RHR	PUMP HEAD TO SHELL WELD	INACCESSIBLE	02	
1-E12-C002C-002	RHR	PUMP SHELL TO SHELL WELD	INACCESSIBLE	02	
1-E12-C002C-003	RHR	PUMP SHELL TO FLANGE WELD	INACCESSIBLE	02	

1

	+	-+	+	+
WELD OR COMP. ID NUMBER	I SYSTEM	CONFIGURATION	NATURE OF OBSTRUCTION	EST. Z COMPLETE
-E12-C002C-012	RHR	PUMP SHELL TO SHELL WELD	INACCESSIBLE	0%
-E12-C002C-013	RHR	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
-E12-C002C-014	RHR	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
-E12-C002C-015	RHR	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
-E12-C002A-012	RHR	PUMP SHELL TO SHELL WELD	INACCESSIBLE	0%
-E12-C002A-013	RHR	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
E12-C002A-014	RHR	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
E12-C002A-015	RHR	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
E21-C001-012	LPCS	PUMP SHELL TO SHELL WELD	INACCESSIBLE	0%
-E21-C001-013	LPCS	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
-E21-C001-014	LPCS	PUMP BARREL LONGSEAM	INACCESSIBLE .	0%
-E21-C001-015	LPCS	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
E22-C001-013	HPCS	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
E22-C001-014	HPCS	PUMP BARREL LONGSEAM	INACCESSIBLE	0%
E22-C001-015	HPCS	PUMP BARREL LONGSEAM	INACCESSIBLE	0%

2

RELIEF REQUEST #22, Rev. 2

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I. Identification of Components

Class 2, Category C-C, Item No. C3.40 integrally welded support attachments (see attached table for ID number).

II. ASME B&PV Section XI Requirements

Table INC-2500-1, Category C-C, Item No. C3.40 requires a surface examination.

III. Relief Requested

Relief is requested from the required 100% surface examination of the penetration fitting to process pipe attachment weld due to inaccessibility of the weld face within the ID of the penetration.

IV. Basis for Relief

The structural integrity of the piping pressure boundary was demonstrated during construction by meeting the requirements of the ASME Code Section III. All welds were inspected in accordance with the appropriate Code requirements, weld techniques and welders were qualified in accordance with Code requirements and materials were purchased and traced in accordance with the appropriate Code and NKC requirements and guidelines. Finally, the pressure boundary received the required hydrostatic test.

Complete examinations meeting the requirements of the ASME Code Section XI were performed on the accessible face of the attachment weld with acceptable results. Since the construction, operating conditions and environmental conditions on the non-inspected portion of the weld are identical to the inspected area, it is reasonable to extend the satisfactory results to the non-inspected areas.

V. Alternate Examination

Penetration attachment welds within the High Energy Break Exclusion Region of piping systems (annotated by an asteriak in the attached table) were ultrasonically examined from the OD surface of the penetration. These augmented examinations were performed to meet FSAR examination requirements for welds within High Energy Break Exclusion Regions. Although not performed specifically to supplement the limited surface examinations, these examinations do provide additional assurance of structural integrity.

11

TABLE 1 RELIEF PEQUEST NO.	22 REV. 2				E 1 of 1
WELD OR COMP. ID NUMBER	SYSTEM	CONFIGURATION	NATURE OF OBSTRUCTION	EST. I COMPLETE IF NOT 1001	+
* 1-G33-P132-WA	RWCU	WELDED ATTACHMENT	INACCESSIBLE	50%	A

Attachment 2 PY-CEI/NRR-0485 L

PNPP PRESERVICE INSPECTION PROGRAM

COMPONENT SUPPORTS