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August 10, 1999  
PY-CEI/NRR-2422L

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

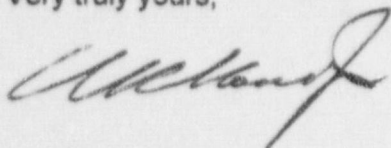
Perry Nuclear Power Plant  
Docket No. 50-440  
Submittal of Additional Information for Relief Request (IR-023)

Ladies and Gentlemen:

By letter dated August 26, 1998 (PY-CEI/NRR-2310L), ASME Section XI relief requests for the Inservice Examination Program at the Perry Nuclear Power Plant were submitted per 10 CFR 50.55a (g)(5)(iii). Attachment 1 provides additional information on one of the relief requests (IR-023) presently under Nuclear Regulatory Commission review.

There are no regulatory commitments contained in this submittal. If you have questions or require additional information, please contact Mr. Henry L. Hegrat, Manager - Regulatory Affairs, at (440) 280-5606.

Very truly yours,



for John K. Wood

Attachment

cc: NRC Project Manager  
NRC Resident Inspector  
NRC Region III

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### **Additional Information for Relief Request (IR-023)**

During recent discussions with the NRC staff, questions arose about one of the Relief Requests (IR-023) submitted by the Perry Nuclear Power Plant (PNPP) staff as part of the second ten-year interval. Below are the questions and the responses given.

**Question 1: Are repairs and replacements of snubbers conducted in accordance with ASME Section XI?**

Answer: Yes, they are conducted in accordance with the PNPP Nuclear Repair and Replacement (NR&R) Manual following the repair and replacement rules of Section XI. IR-023 does not discuss repairs and replacements because relief is not being requested from the Section XI repair and replacement requirements.

**Question 2: Are VT-3 exams performed on the snubbers?**

Answer: There are two different types of visual snubber inspections performed at PNPP, each with its own qualification requirements.

When inspections of component support assemblies that contain snubbers are conducted to fulfill the requirements of the ASME Section XI Inservice Examination Program (ISEP) and are scheduled for examination in accordance with Code Case N-491, VT-3 personnel are required to perform these inspections.

The relief request deals with the visual inspections performed in accordance with Operational Requirements Manual (ORM) 6.4.1. IR-023 is requesting relief from the visual inspection requirements within Part 4 of the OMa-1988 Addenda to the OM-1987 Edition of the Code. These Code requirements do not discuss personnel qualifications for the inspections. Therefore, the relief request also does not discuss whether the inspections are performed as VT-3 examinations or by VT-3 certified personnel. In practice, the PNPP snubber program requires that the visual inspections be performed by either VT-3 certified personnel or personnel qualified specifically as snubber visual inspectors under the program.

This should resolve all the questions that have been discussed concerning Relief Request IR-023.