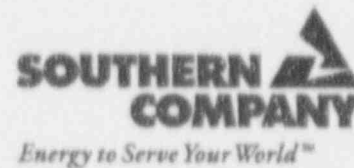


Lewis Sumner
Vice President
Hatch Project Support

Southern Nuclear
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40 Inverness Parkway
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August 8, 1997

Docket Nos. 50-321
50-366

HL-5449

TAC Nos. M93918
M93919

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant
Containment Inspection Rule, Request for Relief

Gentlemen:

Southern Nuclear Operating Company (SNC) is currently in the process of developing a containment inspection program for Plant Hatch. In the course of this development, it has been determined that we should request relief from several requirements resulting from the Containment Inspection Rule which will become effective for SNC on September 9, 1997.

Pursuant to the provisions of 10CFR50.55a(a)(3)(i), SNC is hereby submitting the enclosed requests for relief from the requirements of 10CFR50.55a (61 Federal Register 41303). SNC requests that the NRC grant relief from compliance with the Rule relative to the use of ASME Section XI, 1992 Edition with 1992 Addenda for Class MC components for Code activities other than examination requirements.

Relief Request RR-MC-1 is the result of an extensive review of the requirements of ASME Section XI, 1992 Edition with 1992 Addenda as compared to ASME Section XI, 1989 Edition with respect to Class MC components. It is our assessment that ASME Section XI, Subsection IWE, 1992 Edition with 1992 Addenda may be implemented within the framework of the existing ASME Section XI, 1989 Edition ISI Program while maintaining an acceptable level of quality and safety. By letter dated May 16, 1997, the NRC approved a similar request for relief for a 1 year period ending September 9, 1997 for repair and replacement activities.

In the process of preparing to implement the requirements of the Rule, it has become apparent that creating and maintaining two separate ASME Code version programs does not provide a compensating increase in the level of quality and safety for Class MC components. Two separate ASME Code programs increase the likelihood of error, hence could lead to a degradation of quality. The existing ASME Section XI, 1989 Edition ISI Program has been found acceptable by the NRC (ref. SER dated 6/16/97, TAC M93918

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August 8, 1997

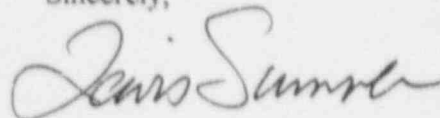
and TAC M93919) for Class 1, 2, and 3 components and is readily adaptable to Class MC for all requirements other than examination. The ASME Section XI, 1992 Edition with 1992 Addenda will be used to determine examination requirements applicable to Class MC components, but all general requirements and requirements associated with repair/replacement activities will be implemented per the ASME Section XI, 1989 Edition.

Relief Request RR-MC-2 requests relief from ASME Section XI, Subsection IWE-5221 and IWE-5240, 1992 Edition with 1992 Addenda requirements for pressure testing of Class MC components. These two sections of the ASME Code appear to reference inappropriate portions of 10CFR50 and other sections of the ASME Code.

The enclosed requests are the only ones we have identified which have immediate impact due to the requirement to implement repair/replacement activities on Class MC components in accordance with ASME Section XI, 1992 Edition with 1992 Addenda by September 9, 1997. Your assistance in responding to these requests is appreciated.

Should you have any questions in this regard, please contact this office.

Sincerely,



H. L. Sumner, Jr.

IFL/eb

Attachments:

1. Relief Request RR-MC-1
2. Relief Request RR-MC-2

cc: Southern Nuclear Operating Company
Mr. P. H. Wells, Nuclear Plant General Manager
NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.
Mr. N. B. Le, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II
Mr. L. A. Reyes, Regional Administrator
Mr. B. L. Holbrook, Senior Resident Inspector - Hatch

Attachment 1

**Edwin I. Hatch Nuclear Plant
Relief Request RR-MC-1**

**RELIEF REQUEST
RR-MC-1**

I. System/Component(s) for Which Relief is Requested:

ASME Code Class MC Components

II. Code Requirement:

By reference in the latest version (8/7/96) of 10CFR50.55a paragraph (b)(2), the ASME Section XI Code, 1992 Edition with 1992 Addenda is applicable, subject to limitations listed in paragraph (b)(2)(vi) and modifications listed in paragraphs (b)(2)(ix) and (b)(2)(x) of 10CFR50.55a, for the examination, repair, and replacement of Class MC components.

III. Code Requirement from Which Relief is Requested:

Relief is requested from the requirements of all paragraphs referenced in Subsection IWE of the ASME Section XI Code, 1992 Edition with 1992 Addenda which are not a part of Subsection IWE.

See Table 2 for a complete listing of the references in the ASME Section XI Code, 1992 Edition with 1992 Addenda Subsection IWE, to other paragraphs in the Code which are not part of Subsection IWE.

IV. Basis for Relief:

The ASME Section XI ISI Program for Plant Hatch which has been approved by the NRC as applicable for all ASME Code Class 1, 2, and 3 components meets the requirements of the ASME Section XI Code 1989 Edition.

The differences between the requirements of applicable Section XI Subsections of the 1992 Edition with 1992 Addenda and the 1989 Edition for Class MC Components are relatively minor (See Table 1 for a summary of the Section XI Subsections for which the 1992 Edition with 1992 Addenda and 1989 Edition have different requirements). However, the creation and administrative maintenance of a program which implements all 1992 Edition with 1992 Addenda requirements for Code Class MC components in addition to the existing program for Class 1, 2, and 3 components (which meets the requirements of the 1989 Edition of Section XI) poses a substantial long term burden to the licensee without a compensating increase in the level of quality and safety. By implementing the proposed alternatives listed below, substantial savings in administrative costs and lessened probability of error can be realized by SNC. The intent of this relief was previously granted for repair and replacement activities for a one year period ending September 9, 1997 (Berkow to Sumner, May 16, 1997).

RELIEF REQUEST
RR-MC-1 (Cont.)

Additionally, ASME Section XI 1992 Edition with 1992 Addenda paragraph IWA-4170(a) requires that; "The Edition and Addenda of Section XI used for the repair/replacement program shall correspond with the Edition and Addenda identified in the inservice inspection program applicable to the inspection interval." The 1989 Edition of ASME XI contains this same requirement in paragraph IWA-4120(b). Therefore, the program for control of repair and replacement of Code components at Plant Hatch was developed to comply with the requirements of the 1989 Edition of ASME XI which is the Code of Record for the 3rd ISI interval.

V. Alternate Examinations:

SNC proposes that, in lieu of the 1992 Edition with 1992 Addenda requirements of all ASME Section XI Subsections other than Subsection IWE, that the ASME Section XI 1989 Edition requirements of the same or corresponding Subsections (and commensurate commitments and relief requests) be utilized with the exception of IWA-4700 of the 1989 Edition which does not give guidance for Class MC pressure testing.

Alternatives, restrictions, or enhancements stipulated by 10CFR50.55a to Section XI 1992 Edition with 1992 Addenda Subsections with regard to Class MC Components will be applicable to the same 1989 Edition Subsections or comparable 1989 Edition Subsections (and commensurate commitments and relief requests).

VI. Justification for the Granting of Relief:

The current ISI Code of Record, ASME Section XI 1989 Edition, contains adequate general and repair/replacement requirements for assuring the structural integrity of Class MC components. The enclosed Table 1 provides a comparison of the major differences between the 1992 with 1992 Addenda and the 1989 Edition of ASME Section XI. Review of Table 1 does not indicate any significant safety enhancements that have been incorporated into the later Code.

Use of the 1992 Edition with 1992 Addenda ASME XI Code entirely for IWE requirements would require the Licensee to develop and maintain a separate program for general and repair/replacement requirements for Class MC components than is utilized for ASME Class 1, 2 and 3 components. This would impose an additional administrative burden with no identifiable benefit from a safety perspective. The use of Subsection IWE only from the 1992 Edition with 1992 Addenda ASME XI Code in conjunction with the administrative and general requirements of the 1989 Code provides adequate assurance for the integrity of Class MC components at Plant Hatch and provides for consistency in the implementation of these requirements for all ISI components.

Since the current ISI Program has been determined to be acceptable for the 3rd ISI Interval at Plant Hatch, then the application of the general and repair/replacement requirements of the 1989 ASME XI Code for Class MC components does not endanger life or property or the common defense and security and is otherwise in the public interest when considering the burden upon the licensee that could result if the requirements were imposed on the facility.

**RELIEF REQUEST
RR-MC-1 (Cont.)**

VII. Implementation Schedule

The subject alternatives will be implemented in accordance with the expedited examination schedule for Class MC components as specified in 10CFR50.55a(g)(6)(ii)(B) during the Third Ten-Year ISI Interval.

Table 1 (Sheet 1 of 3)
 1989 Edition IWA vs. 1992 Edition with 1992 Addenda IWA
 Significant Differences Regarding Class MC

Subsection	Content	Discussion
IWA-1400(p) 92/92A	Defines an owners responsibility to record regions where flaws exceeding the acceptance criteria have been evaluated by analysis to allow continued operation.	Does not exist in 89E, but is considered included in the requirements of IWA-6000 89E and IWE-3112(b) 92/92A.
Table IWA-1600-1	Referenced Standards and Specs.	92/92A references a newer date for some standards and includes some additional standards inconsequential to Class MC components. Only significant difference is ASNT SNT-TC-1A is replaced with ANSI/ASNT CP-189 for personnel qualifications. See IWA-2300 discussion.
IWA-2200(b) 92/92A	Nonmandatory Appendix D may be used for surface preparation for NDE.	Appendix D applies only to Class 1 and 2 weld surface exams.
IWA-2216 89E	Cleaning	This paragraph regarding cleaning standards for visual exams does not exist in 92/92A. 92/92A gives no additional guidance for cleaning for visual exams.
IWA-2210	Visual Examinations	92/92A references Article 9 of Section V with supplemental requirements for procedure demonstration and alternatives to distance and illumination requirements. The differences are inconsequential for Class MC components as evidenced by 10CFR50.55a(b)(2)(x)(B) which allows the requirements of Table IWA-2210-1 92/92A to be relaxed.
IWA-2300	Qualifications of NDE Personnel	92/92A references ANSI/ASNT CP-189 while 89E references SNT-TC-1A for qualification and certification. The differences are inconsequential for Class MC components as evidenced by IWA-2310 92/92A which states that "Certifications based on SNT-TC-1A are valid until recertification is required".

Table 1 (Sheet 2 of 3)

Subsection	Content	Discussion
IWA-4000 92/92A	Repair and Replacement Procedures were combined and IWA-7000 92/92A has been deleted.	IWA-7000 89E requirements for replacement are essentially retained in IWA-4000 92/92A.
IWA-4120 92/92A	Alternative Requirements for Replacement of Small Items	These alternative requirements are not contained in IWA-4000 89E or IWA-7000 89E, however, they are not applicable to Class MC components.
IWA-4110 92/92A IWA-4130 92/92A IWA-4140 92/92A IWA-4150 92/92A IWA-4160 92/92A IWA-4170 92/92A	Repair and Replacement Program and Plan, Scope, Responsibilities, and Code Applicability.	Combines the requirements of IWA-4100 89E and IWA-7200 89E. The 92/92A definition of a Program is essentially the same as 89E definition of a Plan.
IWA-4180 92/92A	Material shall conform to the requirements of the original Design Specification or Section III.	Additional guidance which is not generally applicable to Class MC components is provided for materials and repair of materials.
IWA-4220 92/92A	Welding and Welder Qualification	Requirements are the same as IWA-4400 89E for repairs and meet IWA-7320 89E for replacements
IWA-4400 92/92A	Repair of Heat Exchanger Tubing	Not contained in 89E and not applicable to Class MC components.
IWA-4500 92/92A	Alternative Repair Welding Methods	Comparable requirements are contained in 89E.
IWA-4500(b) 92/92A	For the repair of base materials and welds used for Class MC components, the requirements of IWA-4540 92/92A may be used (Temperbead without Post Weld Heat Treat).	IWA-4120(a)(4) 89E references IWE-4000 89E for alternative requirements for Class MC components. IWE-4000 89E is identical to IWA-4540 92/92A and would be the appropriate reference, if required.
IWA-4510	Repair Welding by Half Bead Welding Technique without Post Weld Heat Treat.	IWA-4540 92/92A and IWE-4000 89E both reference IWA-4510 as an alternative. IWA-4510 92/92A is more restrictive than IWA-4510 89E. However, IWA-4510 89E is endorsed by 10CFR50.55a for repairs of Class 1, 2, and 3 components. Furthermore, Post Weld Heat Treat was not required in the original construction for Class MC components at Plant Hatch.

Table 1 (Sheet 3 of 3)

Subsection	Content	Discussion
IWA-4600 92/92A	Installation of Replacements	Same requirements for welding as IWA-7510 89E. Includes additional requirements for mechanical joints on Class 1 piping systems.
IWA-4720 92/92A	Pressure Tests	92/92A provides for pressure testing of Class MC components in accordance with IWE-5000 92/92A following repair or replacement. 89E does not. 92/92A will be applied for pressure testing.
IWA-5000	System Pressure Tests	IWE-5210 92/92A and IWE-5240 92/92A state that the requirements of IWA-5000 are not applicable to Class MC components except for IWA-5246 92/92A.
IWA-5246 92/92A	Does Not Exist.	92/92A does not contain this paragraph. The reference in IWE-5240 92/92A to IWA-5246 92/92A must be an error in the Code.
IWA-6000	Records and Reports	IWE-3112 92/92A and IWE-3122.1 92/92A reference IWA-6220 92/92A which contains requirements for preparation of abstract of examination required by Form NIS-1. This does not exist in IWA-6000 89E. RR-14 of the Third Interval ISI Program uses Code Case N532 to define reports alternative to NIS-1 and NIS-2.

Table 2
Proposed Alternate Reference

COLUMN 1 IWE 92/92A (1)	COLUMN 2 92/92A Reference (2)	COLUMN 3 Proposed 89E Reference (3)
E-3112(a)	IWA-1400(h)	IWA-1400(h)
IWE-3122.1	IWA-1400(h)	IWA-1400(h)
IWE-3111	IWA-2200	IWA-2200
IWE-3114	IWA-2200	IWA-2200
IWE-3124	IWA-2200	IWA-2200
IWE-2500(a)	IWA-2240	IWA-2240
IWE-3200	IWA-2240	IWA-2240
IWE-2411(b)	IWA-2430(c)	IWA-2430(c)
IWE-2412(b)	IWA-2430(d)	IWA-2430(d)
IWE-2200(e)	IWA-4000	IWA-4000 (repair) IWA-7000 (replace)
IWE-3114	IWA-4000	IWA-4000 (repair) IWA-7000 (replace)
IWE-3124	IWA-4000	IWA-4000 (repair) IWA-7000 (replace)
IWE-4100	IWA-4000	IWA-4000
IWE-7100	IWA-4000	IWA-7000
IWE-5210	IWA-5000	IWA-5000
IWE-5240	IWA-5246	IWA-5246
IWE-2200(c)(2)	IWA-6000	IWA-6000
IWE-2200(f)(3)	IWA-6000	IWA-6000
IWE-3112(a)	IWA-6220	IWA-6000
IWE-3122.1	IWA-6220	IWA-6000
IWE-2200(e)	IWB-2000	IWB-2000
IWE-2200(e)	IWC-2000	IWC-2000
IWE-2200(e)	IWD-2000	IWD-2000
IWE-2500-1, Cat. E-A, Note 5 @	Section III, NE-4435	Section III, NE-4435
IWE-2200(c) @	Section III, NE-5000	Section III, NE-5000
IWE-2500(c)(2) @	Section V, T-544	Section V, T-544

- (1) Paragraphs in the 92/92A ASME XI Code Subsection IWE which reference other paragraphs in other Subsections of the Code.
- (2) Paragraphs referenced by those listed in Column 1.
- (3) Proposed paragraph in 1989 Edition of ASME XI Code to be used in lieu of those listed in Column 2.

@ The references of these subsections to Section III and Section V are included in the table for completeness. Neither the CFR nor the ASME Code clearly address which Edition and Addenda are to be used.

Attachment 2

**Edwin I. Hatch Nuclear Plant
Relief Request RR-MC-2**

**RELIEF REQUEST
RR-MC-2**

I. System/Component(s) for Which Relief is Requested:

ASME Code Class MC Components

II. Code Requirement:

ASME Section XI, 1992 Edition with 1992 Addenda paragraphs IWE-5221 and IWE-5240 for Pressure Testing and Visual Examination during Pressure Testing.

III. Code Requirement for Which Relief is Requested.

1. IWE-5221 requires that pressure tests be conducted on Class MC components following repair or replacement in accordance with 10CFR50 Appendix J, Paragraph IV.A.
2. IWE-5240 references IWA-5246 for visual examinations conducted in conjunction with pressure testing.

IV. Basis for Relief

1. 10CFR50 Appendix J paragraph IV.A is contained in Option A of Appendix J only. The NRC revised 10CFR50, effective October 26, 1995, and approved Option B of Appendix J which is a performance based leakrate testing program. The NRC issued Regulatory Guide 1.163 which endorsed the Nuclear Energy Institute (NEI) Guideline NEI 94-01 for the implementation of Appendix J Option B. NEI 94-01 paragraph 9.2.4 contains guidelines for leakrate testing after containment repairs and modifications. Plant Hatch amended its Technical Specifications and adopted Appendix J, Option B, in 1995. Therefore, the guidance contained in NEI 94-01 is applicable for leakrate testing after containment repairs and modifications.
2. ASME Section XI, 1992 Edition with 1992 Addenda does not contain a paragraph IWA-5246. Therefore, SNC assumes this to be a typographical error and provides a basis for not applying paragraph IWA-5240. IWA-5240 is applicable to ASME Section XI system leakage tests per Tables IWB/IWC/IWD-2500-1 where visual examination, VT-2, identifies the source of fluid leakage. However, leakrate testing per Appendix J requires precise measurement of the leakrate from each test boundary and visual examination, VT-2, for leakage is not appropriate. Table IWE-2500-1, Examination Category E-P, references 10CFR50 Appendix J for the Examination Method for pressure testing, not IWA-5240 as does the IWB, IWC and IWD-2500-1 Tables. 10CFR50 Appendix J leakrate testing does not require visual examination for leakage during the performance of leakrate testing. The reference to IWA-5246 in IWE-5240 appears to be inappropriate.

RELIEF REQUEST
RR-MC-2 (Cont.)

and inconsistent with the examination method referenced in Table IWE-2500-1, Examination Category E-P since visual examination is not appropriate for leakrate testing where instrumentation provides measurement of the leakrate.

V. Alternate Examinations

1. Pressure testing of Class MC components will be performed per the guidance provided in NEI 94-01, paragraph 9.2.4, for any containment repairs or modifications at Plant Hatch. All such pressure testing will be performed in accordance with 10CFR50 Appendix J.
2. Pressure testing of Class MC components will be performed in accordance with 10CFR50 Appendix J, which does not include visual examination requirements.

VI. Justification for the Granting of Relief

10CFR50 Appendix J, Option B, had not been approved for use when the 1992 with 1992 Addenda ASME XI Code was issued. However, the NRC endorsed the use of Appendix J, Option B and the guidance in NEI 94-01 via Regulatory Guide 1.163. NEI 94-01 includes requirements for leakrate testing of containment repairs and replacements to assure the leakrate integrity of containment structures and penetrations. Therefore, the Commission has previously determined that the use of 10CFR50 Appendix J, Option B, with the guidance of NEI 94-01, provides adequate assurance for leakrate integrity of containment components and does not endanger life or property or the common defense and security and is otherwise in the public interest.

The Licensee has amended its Technical Specifications and developed administrative and implementation procedures to apply leakrate testing in accordance with Appendix J, Option B. This application agrees with the latest approved regulatory positions relative to containment leakrate testing and thus should take precedence over the requirements of a previously issued version of the ASME XI Code.

VII. Implementation Schedule

The subject alternatives will be implemented in accordance with the expedited examination schedule for Class MC components as specified in 10CFR50.55a(g)(6)(ii)(B) during the Third Ten-Year ISI Interval.