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James Knubel  
Senior Vice President and  
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November 4, 1999  
JPN-99-037

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

Subject: James A. FitzPatrick Nuclear Power Plant  
Docket 50-333  
**JAF Third Ten Year Inservice Inspection Interval  
Use of NRC Approved ASME Code Cases**

Reference: NRC letter, S. Bajwa to J. Knubel, "James A. FitzPatrick Nuclear Power Plant – Third Interval Inservice Inspection Program Relief Request (TAC No. MA0711)," dated November 25, 1998.

Dear Sir:

This letter provides clarification for the use of ASME Code Cases in the FitzPatrick Inservice Inspection (ISI) Program. The referenced letter granted NRC approval for the relief requests (RR) submitted for the James A. FitzPatrick third ten year ISI interval. RRs #1 and #4, granted by the NRC Safety Evaluation Report (SER), relied upon the use of ASME Code Cases which had not yet been incorporated into Regulatory Guide 1.147. FitzPatrick requested use of these Code Cases with certain exceptions. These plant specific exceptions are as follows:

RR #1 - Code Case N-416-1: FitzPatrick intends to utilize radiograph or ultrasonics as the volumetric method, PT or MT as the surface method, and the techniques and Acceptance Standards of these examinations will be in accordance with the 1989 Edition of Section XI or the 1992 Edition of Section III. Visual examination (VT-2) will be conducted in accordance with the 1989 or 1992 Edition of Section XI.

RR #4 - Code Case N-509: JAF will define the examination category and item no.(s) for Class 3 integrally welded attachments in accordance with ASME Section XI, 1989 Edition, Article IWD, Table IWD-2500-1.

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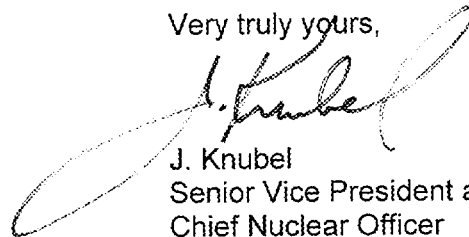
The referenced letter approved the use of these Code Cases and plant specific exceptions. The conclusion section of this letter states, in part,

"Relief requests nos. 1-6, and 13 relate to application of various Code Cases. As noted above, the use of these Code Cases is authorized for the current interval, or until such time as a Code Case is published in a future revision of Regulatory Guide 1.147. At that time, if the licensee intends to continue to implement those Code Cases, the licensee should follow all provisions in the Code Cases with limitations issued in Regulatory Guide 1.147, if any."

Since the issuance of the NRC SER in November of 1998, a new revision of Regulatory Guide (RG) 1.147 has been issued (May 1999). This new RG revision contains two codes cases (i.e., N-416-1 and N-509) approved for use at FitzPatrick. As stated in the NRC's SER, FitzPatrick will comply with the provisions of the Code Cases and the additional restrictions listed in the RG. In addition, FitzPatrick will continue to utilize the aforementioned plant specific exceptions, in conjunction with the Code Cases, for the remainder of the third ISI interval as approved by the NRC in the referenced letter.

This letter contains no new commitments. If you have any questions, please contact Ms. C. D. Faison.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Knubel", is written over a large, stylized, looping flourish that extends to the left and then curves back under the signature.

J. Knubel  
Senior Vice President and  
Chief Nuclear Officer

Attachments: As stated  
cc: See next page

cc: Regional Administrator  
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