

Niagara Mohawk

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NMP1L 1477

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

RE: Nine Mile Point Unit 1
 Docket No. 50-220
 DPR-63

 Nine Mile Point Unit 2
 Docket No. 50-410
 NPF-69

Subject: *Use of 1998 Edition of ASME Code Section XI for Containment Inspections*

Gentlemen:

Currently, 10 CFR 50.55a(g)(6)(ii)(B) requires expedited containment inspections per Subsections IWE and IWL of Section XI of the ASME Boiler and Pressure Vessel Code (1992 Edition with 1992 Addenda), as modified by 10 CFR 50.55a(b)(2)(ix) and 10 CFR 50.55a(b)(2)(x). Licensees of all operating nuclear power plants are required to complete the first period inspections by September 9, 2001.

By letter dated July 23, 1999, the NRC granted relief to Comanche Peak Steam Electric Station (CPSES), Units 1 and 2, to use the 1998 Edition of Subsections IWE and IWL of the ASME Code as an alternative to the 1992 Edition with 1992 Addenda. This action was based on the NRC's conclusion that use of the 1998 Code Edition, as supplemented by the licensee's (TU Electric's) commitments in response to the NRC staff's Requests for Additional Information (RAIs) would provide an acceptable level of quality and safety, thereby meeting the criteria stated in 10 CFR 50.55a(a)(3)(i) for granting relief.

Consistent with the above, Niagara Mohawk Power Corporation (NMPC) is requesting relief to use the 1998 Edition of subsections IWE and IWL of the ASME Code as an alternative to the 1992 Edition with 1992 Addenda for Nine Mile Point Unit 1 and Unit 2 (NMP1 and NMP2). In making this request, NMPC is proposing the same commitments that were made by TU Electric for CPSES, Units 1 and 2. Enclosure 1 contains one relief request applicable to NMP1 (RR-IWE/IWL-1, for metallic containment components) and two relief requests applicable to NMP2 (RR-IWE/IWL-1 for metallic containment components and RR-IWE/IWL-2 for concrete containment components.) NMPC is requesting that these relief requests be approved for the duration of the first ten-year containment inspection intervals, i.e., from September 9, 1996 to September 1, 2008 for NMP1 and from September 9, 1996 to

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April 4, 2008 for NMP2. Enclosure 2 contains supplemental requirements that will be incorporated into the NMP1 and NMP2 containment inspection programs pending NRC approval of the enclosed relief requests. These supplemental requirements address the commitments made by CPSES, Units 1 and 2, in their RAI responses regarding use of the 1998 Code Edition.

NMP2 is scheduled to begin its refueling outage number 7 (RFO7) in March 2000. NMPC plans to begin the first period expedited containment inspections for NMP2 prior to RFO7 and complete them after RFO7. To support this plan, it is requested that the NRC approve the NMP2 relief requests by January 15, 2000.

Very truly yours,



Richard B. Abbott
Vice President Nuclear Engineering

RBA/IAA/jb
Enclosures

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. S. S. Bajwa, Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. D. S. Hood, Senior Project Manager, NRR
Records Management

RELIEF REQUEST
NINE MILE POINT UNIT 1

Identifier: RR-IWE/IWL-1

Component: Metallic containment shell and penetration liners and their integral attachments.

System Title: Containment

Function: Containment leak-tight integrity

Code Class: ASME Section XI Class MC and Shell and Metallic Liner of Class CC Components

Examination Requirements:

1992 Edition with the 1992 Addenda of Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Power Plants", of Section XI, Division 1, of the American Society of Mechanical Engineers Boiler and Pressure Vessel (B&PV) Code.

Recommended Substitute:

In accordance with 10CFR 50.55a(a)(3)(i), specific relief is requested for Nine Mile Point Unit 1 (NMP1) from compliance with the 1992 Edition with the 1992 Addenda of Subsection IWE, ASME B&PV Code requirements on the basis that the proposed alternative will provide an acceptable level of quality and safety. NMP1 proposes to use, as an alternative to the current requirements, the 1998 Edition of ASME Code Section XI, Subsection IWE.

Technical Justification and Data to Support the Determination:

The 1998 Edition incorporates and provides clarification to the requirements of the 1992 Edition with the 1992 Addenda and provides a uniform set of requirements that eliminates the need for multiple relief requests. The use of the 1998 Edition of Section XI provides more practical requirements for the performance, training, qualification and scheduling of examinations.

Period for Which Relief is Requested:

Relief is requested for the first ten-year inspection interval of the Containment Inservice Inspection Program for Nine Mile Point Unit 1.

RELIEF REQUEST
NINE MILE POINT UNIT 2

Identifier: RR-IWE/IWL-1

Component: Metallic containment shell and penetration liners and their integral attachments.

System Title: Containment

Function: Containment leak-tight integrity

Code Class: ASME Section XI Class MC and Shell and Metallic Liner of Class CC Components

Examination Requirements:

1992 Edition with the 1992 Addenda of Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Power Plants", of Section XI, Division 1, of the American Society of Mechanical Engineers Boiler and Pressure Vessel (B&PV) Code.

Recommended Substitute:

In accordance with 10CFR 50.55a(a)(3)(i), specific relief is requested for Nine Mile Point Unit 2 (NMP2) from compliance with the 1992 Edition with the 1992 Addenda of Subsection IWE, ASME B&PV Code requirements on the basis that the proposed alternative will provide an acceptable level of quality and safety. NMP2 proposes to use, as an alternative to the current requirements, the 1998 Edition of ASME Section XI, Subsection IWE.

Technical Justification and Data to Support the Determination:

The 1998 Edition incorporates and provides clarification to the requirements of the 1992 Edition with the 1992 Addenda and provides a uniform set of requirements that eliminates the need for multiple relief requests. The use of the 1998 Edition of Section XI provides more practical requirements for the performance, training, qualification and scheduling of examinations.

Period for Which Relief is Requested:

Relief is requested for the first ten-year inspection interval of the Containment Inservice Inspection Program for Nine Mile Point Unit 2.

RELIEF REQUEST
NINE MILE POINT UNIT 2

Identifier: RR-IWE/IWL-2

Component: Concrete Containment Components

System Title: Containment

Function: Structural integrity

Code Class: ASME Section XI Class CC Concrete Components

Examination Requirements:

1992 Edition with the 1992 Addenda of Subsection IWL, "Requirements for Class CC Concrete Components of Light-Water Cooled Power Plants", of Section XI, Division 1, of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code.

Recommended Substitute:

In accordance with 10CFR 50.55a(a)(3)(i), specific relief is requested for Nine Mile Point Unit 2 (NMP2) from compliance with the 1992 Edition with the 1992 Addenda of Subsection IWL, ASME B&PV Code requirements on the basis that the proposed alternative will provide an acceptable level of quality and safety. NMP2 proposes to use, as an alternative to the current requirements, the 1998 Edition of ASME Section XI, Subsection IWL.

Technical Justification and Data to Support the Determination:

The 1998 Edition incorporates and provides clarification to the requirements of the 1992 Edition with the 1992 Addenda and provides a uniform set of requirements that eliminates the need for multiple relief requests. The use of the 1998 Edition of Section XI provides more practical requirements for the performance, training, qualification and scheduling of examinations.

Period for Which Relief is Requested:

Relief is requested for the first ten-year inspection interval of the Containment Inservice Inspection Program for Nine Mile Point Unit 2.

SUPPLEMENTAL REQUIREMENTS
NINE MILE POINT UNITS 1 AND 2

The South Texas Comanche Peak Steam Electric Station (CPSES) submitted relief requests to use the 1998 Edition of the ASME Boiler and Pressure Vessel Code subsections IWE and IWL in lieu of the 10 CFR 50 mandated 1992 Edition with 1992 Addenda. CPSES has been granted relief to use the 1998 Edition of the Code by NRC letter dated July 23, 1999. The Safety Evaluation attached to the NRC letter approved the use of the 1998 Code with additional clarifications and requirements. The following requirements were addressed by the Safety Evaluation and have been reviewed for applicability to the Nine Mile Point Unit 1 and Unit 2 (NMP1 and NMP2) containment inspection programs.

- "General Visual Examination" criteria will be developed from existing VT-3 procedures that are used to examine ASME Class 1, 2, and 3 components.
- Pressure retaining bolting examination criteria will be developed from the VT-1 procedure used for Class 1 bolting.
- Moisture barriers are examined for tears, cracks, or damage that permits moisture to intrude.
- "Detailed Visual Examination" criteria will be developed from VT-1 and VT-3 procedures.
- The containment visual examination procedure qualification requirement for lighting and illumination will be similar to, and developed from, the procedures used for VT-1 and VT-3 examinations of ASME Class 1, 2, and 3 components.
- For IWE examinations where remote visual examination systems are to be used, those systems will be demonstrated to have a resolution capability at least equivalent to that attainable by direct visual examination. Containment visual examination procedures will be demonstrated to the authorized nuclear inservice inspector for capability to detect flaws and degradation levels defined within the procedure, and the containment visual examination program will be developed from the guidelines of SNT-TC-1A and ANSI N45.2.6. Certified personnel will have "demonstrated skill, demonstrated knowledge, documented training, and documented experience required to properly perform the duties of a specific job."
- The current maintenance rule program identifies the peeling and cracking of paint as a degradation mechanism. An additional paragraph will be added to program procedures stating that when degradation exists on the containment liner the containment ISI program owner will be notified prior to repair activities and that repair/replacement of coatings falls under the jurisdiction of the ASME Code Section XI repair/replacement

program. The repair/replacement responsible individual shall be notified prior to repair/replacement activities that include the removal and reapplication of coatings.

- When required, augmented ultrasonic examinations will be performed on class MC components and to shell and metallic liners of class CC components. These augmented examinations will be performed and accepted to the requirements of the 1998 Edition of ASME Code Section XI, Subsection IWE.
- For IWL examinations where remote visual examination systems are to be used, those systems will be demonstrated to have a resolution capability at least equivalent to that attainable by direct visual examination. Containment visual examination procedures will be demonstrated to the authorized nuclear inservice inspection for capability to detect flaws and degradation levels defined within the procedure, and the containment visual examination program will be developed from the guidelines of SNT-TC-1A and ANSI N45.2.6. Certified personnel will have "demonstrated skill, demonstrated knowledge, documented training, and documented experience required to properly perform the duties of a specific job."
- For IWE/IWL areas that are determined to be suspect, a detailed visual examination will be performed.

Pending NRC approval, Niagara Mohawk Power Corporation will incorporate these requirements into the NMP1 and NMP2 containment inspection programs and use them to develop the procedures for visual examinations required by the ASME Code Section XI.