

August 2, 2000

MEMORANDUM TO: Marsha Gamberoni, Chief, Section I  
Project Directorate I  
Division of Licensing Project Management

FROM: Guy S. Vissing, Senior Project Manager, Section 1 */RA by Peter Tam for/*  
Project Directorate I  
Division of Licensing Project Management

SUBJECT: MATERIAL TO BE PLACED INTO THE NRC PUBLIC DOCUMENT ROOM  
AND ADDED TO THE AGENCYWIDE DOCUMENTS ACCESS AND  
MANAGEMENT SYSTEMS PUBLICLY AVAILABLE RECORDS SYSTEM  
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The attached was received via e-mail on July 18, 2000, from the Power Authority of the State of New York and represents the response to a phone conference call with the FitzPatrick representatives concerning the risk-informed Inservice Inspection Program. This material should be part of the official records.

Docket No. 50-333

Attachment: As stated

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G. Vissing

S. Little

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DATE	8/2/00	8/2/00	8/2/00

OFFICIAL RECORD COPY

**From:** "Steigerwald, Bob" <Bob.Steigerwald@nypa.gov>  
**To:** "Guy Vissing" <GSV@nrc.gov>  
**Date:** Tue, Jul 18, 2000 2:17 PM  
**Subject:** RE: RE: TAC MA8767

Guy,

See attached.

-----Original Message-----

From: Guy Vissing [mailto:GSV@nrc.gov]  
Sent: Tuesday, July 18, 2000 1:01 PM  
To: Bob.Steigerwald@nypa.gov  
Subject: Re: RE: TAC MA8767

Thanks for the update. On another subject. When can we expect your response on the risk informed ISI questions? My reviewers are anxious to get the relief granted.

1. Please provide the following information:
  - a) When does the current 10-year inspection interval start and end?
  - b) When does the current inspection period start and end?
  - c) What cumulative percentage of inspections have been completed for the current interval?

NYPA Response:

- a, Our current interval started 9/28/97 and will end 9/27/2006.
- b, Our 1st period starts on 9/27/97 and the original end date was 9/27/2000, but we extended this 6 months as allowed by ASME XI IWB-2412 (b) to "capture our next refueling outage". This is allowed by the ASME XI code. Our new end date is 3/28/2001. We have one outage completed in the first period (R13). Our next outage, R14, will also be in the 1st inspection period.
- c, We are on track to meet the first period requirements under ASME XI Inspection Program B. Since we are midway (1 outage done and 1 outage to go) into the first period we have decided to do 100% of the risk base inspections in the remainder of the interval and will meet the 1st period requirements. The end date of the interval remains the same. As does the 1st period defined in question 1A.

C:\ALI\RI-ISI\Questions Re Start Date etc.wpd

Attachment

We will not prorate the risk based inspection program for the one outage under which we did an ASME XI program. We will take credit for any risk base examinations that meet the requirements that were completed in the last outage (R13). There were approximately 4 examinations performed last outage that are in the risk based program.

2. The implementation of a RI-ISI program for piping should be initiated at the start of a plant's 10-year inservice inspection interval consistent with the requirements of the ASME Code Section XI, Edition and Addenda committed to by the Owner in accordance with 10 CFR 50.55a. However the implementation, may begin at any point in an existing interval as long as the examinations are scheduled and distributed to be consistent with ASME XI requirements, e.g., the maximum examinations credited at the end of the three inspections intervals under Program B should be 34%, 67%, and 100%, respectively, etc.

It is our view that virtually it is a necessity that the programs for the RI-ISInspections (RI-ISIs) and for the balance of the inspections be on the same interval start and end dates. This can be accomplished by either implementing the RI-ISIs at the beginning of the interval or merging RI-ISIs into the program for the balance of the inspections if the RI-ISIs are to begin during an existing ISI interval. One reason for this view is that it eliminates the problem of having different Codes of record for the RI-ISIs and and for the balance of the inspections. A potential problem with using two different interval start dates and hence two different Codes of record would be having two sets of repair/replacement rules depending upon which program identified the need for repair (e.g., a weld inspection versus a pressure test).

In addition, with the change to a RI-ISI program the Code minimum and maximum percentages of examination per period still apply to the RI-ISIs. For example, if a licensee is interested in starting the RI-ISIs during the second period, either the RI-ISIs or the Code required inspections will have to satisfy the second period minimum/maximum percentages. The code required percentages would have already been satisfied for the first period.

Please describe your implementation plan with respect to the above discussion.

NYPA Response:

We realize this is a major problem, the Authority will do 100% of the risk based inspections in the interval/period requirements for the FitzPatrick plant without changing the interval end date. Thus our ASME XI Code of record does not change nor is the repair/replacement program or pressure test program changed.

3. Will the RI-ISI program be updated every 10 years and submitted to the NRC consistent with the current ASME XI requirements?

NYPA Response:

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Attachment

Yes, we would submit our 4th interval ISI Program which would include the risk based program (revised) as part of this submittal. We believe this is required under 10CFR50.55a.

4. Under what conditions will the RI-ISI program be resubmitted to the NRC before the end of any 10-year interval?

NYPA Response:

We would submit any revised risk based ISI program prior to the end of the interval if relief requests are required from certain aspects or if there are program changes that require NRC approval, just like the current ASME XI program.

If there are any further questions please contact Robert Steigerwald at (315) 349-6209.