

August 18, 2000

Mr. Ted C. Feigenbaum  
Executive Vice President and  
Chief Nuclear Officer  
North Atlantic Energy Service Corporation  
c/o Mr. James M. Peschel  
P.O. Box 300  
Seabrook, NH 03874

SUBJECT: EVALUATION OF ALTERNATIVES TO AMERICAN SOCIETY OF  
MECHANICAL ENGINEERS (ASME) SECTION XI CONTAINMENT  
INSERVICE INSPECTION REQUIREMENTS FOR SEABROOK STATION,  
UNIT NO. 1 (TAC NO. MA8780)

Dear Mr. Feigenbaum:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the subject relief requests for the Seabrook Station, Unit No. 1 submitted by North Atlantic Energy Service Corporation (the licensee) in its letter dated April 25, 2000. Based on the information provided in the relief requests, the staff concludes that for Relief Requests CRR-1, 4, 5, and 6, the licensee's proposed alternatives will provide an acceptable level of quality and safety. Therefore, the proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(i). For Relief Requests CRR 2 and 3, the staff concludes that compliance with the ASME Boiler and Pressure Vessel Code requirements would result in hardship without a compensating increase in the level of quality and safety, and that the licensee's proposed alternatives will provide reasonable assurance of containment pressure integrity. Therefore, the proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

The NRC staff's evaluation and conclusions are contained in the enclosed Safety Evaluation. Please contact the NRC Project Manager, Robert M. Pulsifer, at 301-415-3016 if you have any questions. This completes the staff's effort on TAC No. MA8780.

Sincerely,

**/RA/**

James W. Clifford, Chief, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-443

Enclosure: Safety Evaluation

cc w/encl: See next page

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**DISTRIBUTION:**

PUBLIC	PDI-2 Rdg.	E. Adensam	J. Clifford	R. Pulsifer
T. Clark	OGC	ACRS	G. Hill(2)	J. Linville, RI

\*SE input provided 07/06/00

ACCESSION NO: ML003734048

No major changes made

OFFICE	PDI-2/PM	EMEB:DE	PDI-2/LA	OGC	PDI-2/SC
NAME	RPulsifer	DTerao*	TClark	RHoefling	JClifford
DATE	7/31/00	07/06/00	7/30/00	8/8/00	8/16/00

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUESTS FROM THE ASME SECTION XI REQUIREMENTS

AS ENDORSED BY 10 CFR 50.55a FOR CONTAINMENT INSPECTION

SEABROOK STATION, UNIT NO. 1

NORTH ATLANTIC ENERGY SERVICE CORPORATION

DOCKET NO. 50-443

1.0 INTRODUCTION

In Federal Register Notice No.154, Volume 61, dated August 8, 1996, the Nuclear Regulatory Commission (NRC) announced an amendment to its regulation, 10 CFR 50.55a (rule). The rule incorporated by reference the 1992 Edition with 1992 Addenda of Subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* (the Code). Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of Class CC (concrete containments), and Class MC (metallic containments) of light-water cooled power plants. The effective date for the amended rule was September 9, 1996, and it required licensees to incorporate the new requirements into their ISI plans and to complete the first containment inspection by September 9, 2001. However, a licensee may submit a request for relief or propose an alternative to one or more requirements of the regulation (or the endorsed code requirements) with proper justification. The provision for granting relief or authorizing an alternative is incorporated in the regulation pursuant to 10 CFR 50.55a(f)(6) and 10 CFR 50.55a(a)(3), respectively.

The NRC further amended its regulations on September 22, 1999, to incorporate by reference the 1995 Edition up to and including the 1996 Addenda of the Code. Pursuant to 10 CFR 50.55a(b)(2)(vi), the North Atlantic Energy Service Corporation (NAESCO, the licensee) developed its containment ISI program in accordance with Subsections IWE and IWL of Section XI of the 1995 Edition (including the 1996 Addenda) of the Code. This evaluation addresses the merits of the requests for relief (Ref. 1) proposed by NAESCO for the Seabrook Station, Unit No. 1.

**Relief Request No.** CRR-1 - Examination Requirements for Class MC Seals and Gaskets

**Components for which Relief is Requested:**

This request is applicable to seals and gaskets of ASME Code Class MC components.

ENCLOSURE

**ASME Code Class:** MC

**Examination Category:** E-D, Item Nos. E5.10 Seals and E5.20 Gaskets

**Code Requirement for which Relief is Requested:**

ASME Section XI, 1995 Edition, 1996 Addenda, IWE-2500 and Table IWE-2500-1 require seals and gaskets on airlocks, hatches, and other devices to be visually examined (VT-3) once each interval. Note 1 of the subject table identifies that examinations shall include seals and gaskets on airlocks, hatches, and other devices that are required to assure leak-tight integrity. It is additionally identified that sealed or gasketed connections need not be disassembled solely for performance of examinations.

**Basis and Justification for the Granting of Relief:**

In accordance with 10 CFR 50.55a(a)(3)(i), relief is requested from the Code requirements to perform visual examinations of Class MC seals and gaskets. This relief is requested on the basis that the proposed alternative to test the subject components in accordance with the requirements of 10 CFR Part 50, Appendix J only will provide an acceptable level of quality and safety.

Seals and gaskets receive a Type B local leakage rate test as required by 10 CFR Part 50, Appendix J. As noted in 10 CFR Part 50, Appendix J, the purpose is to measure leakage of containment penetrations whose design incorporates resilient seals, gaskets, sealant compounds, piping penetrations fitted with expansion bellows, and electrical penetrations fitted with flexible metal seal assemblies. Since the Type B test will assure the leak-tight integrity of the connection, the performance of a visual examination once each interval would not increase the level of quality or safety.

Seals and gaskets are not included in the definition of pressure-retaining material in current Code rules (1998 Edition of Section III (NE-2110(b) of the ASME Boiler and Pressure Vessel Code). When the airlocks and hatches containing these materials are tested in accordance with 10 CFR Part 50, Appendix J, degradation of the seal or gasket material is revealed by an increase in the leakage rate. In this case, corrective measures would be applied and the component retested. Furthermore, seals and gaskets are specifically excluded from Code rules for Repair and Replacement in IWA-4120(b)(5) (1995 Edition, including 1996 Addenda). Additionally, the requirement to examine seals and gaskets does not appear in the 1998 Edition of ASME Section XI.

**Alternative Examination:**

Seals and gaskets will be tested in accordance with 10 CFR Part 50, Appendix J only.

**Relief Request Applicability:**

This relief request is applicable to the First 10-Year Containment ISI Interval.

**Staff Evaluation:**

The licensee proposes to use the existing 10 CFR Part 50, Appendix J, Type B testing as a verification of seal and gasket integrity, rather than disassembling the subject components for the sole purpose of examination.

Performing the VT-3 examinations on the subject gaskets and seals would require disassembly and reassembly of the mechanical connection for those penetrations that are not routinely disassembled during a refueling outage. The ASME Main Committee and the Board of Nuclear Codes and Standards have also determined that a VT-3 examination of the seals and gaskets is no longer warranted. Both organizations have approved a revision to Subsection IWE to delete the requirement for performing a VT-3 examination of the seals and gaskets. This revision to Subsection IWE was published in the 1998 Edition of the ASME Code, Section XI. Requiring the licensee to disassemble components for the sole purpose of inspecting seals and gaskets would place a significant hardship on the licensee without a compensating increase in the level of quality and safety.

The licensee will verify the leak-tight integrity of seals and gaskets, utilized on penetrations, that are required to assure containment leak-tight integrity in accordance with the applicable requirements of 10 CFR Part 50, Appendix J. The proposed testing provides reasonable assurance of containment leak tight integrity. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

**Relief Request No.** CRR-2 - Torque or Tension Test Requirements for Class MC Bolted Connections

**Components for which Relief is Requested:**

This request is applicable to pressure-retaining bolted connections of ASME Code Class MC components.

**ASME Code Class:** MC

**Examination Category:** E-G, Item No. E8.20 Bolted Connections

**Code Requirement for which Relief is Requested:**

IWE-2500, Table IWE-2500-1 requires bolt torque-tension tests to be performed on 100% of the bolts when the connection has not been disassembled and reassembled during the interval.

**Basis and Justification for the Granting of Relief:**

Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested from the Code requirements stated above on the basis that compliance with this requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a was amended in the *Federal Register* (64 FR 51370) on September 22, 1999, to permit the use of the 1995 Edition, 1996 Addenda of Section XI when performing containment examinations. Bolt torque or tension testing is required on bolted connections that have not been disassembled and reassembled during the inspection interval. Similarly, the Seabrook Station containment does not contain pressure-unseating penetrations.

Determination of the torque or tension value would require that the bolting be untorqued and then re-torqued or re-tensioned. The performance of the 10 CFR Part 50, Appendix J, Type B test itself proves that the bolt torque or tension remains adequate to provide a leak rate that is within acceptable limits. The torque or tension value of bolting only becomes relevant if the leak rate is excessive. Once a bolt is torqued or tensioned, it is not subject to dynamic loading that could cause it to experience significant change.

An in-situ test of an undisturbed connection would not be meaningful. If paint or corrosion were discovered on the bolted connection, it may result in a higher indicated torque and may not be representative of the preload on the connection.

Testing the bolted penetrations in accordance with 10 CFR Part 50, Appendix J provides adequate assurance of the leak-tight integrity of the bolted penetrations. Additionally, the requirement for torque-tension testing of containment bolting does not appear in the 1998 Edition of Section XI, Subsection IWE.

#### **Alternative Examination:**

The following examinations and tests required by Subsection IWE ensure the structural integrity and leak-tightness of Class MC pressure-retaining bolting. Therefore, no additional alternative examinations are proposed.

1. Exposed surface of bolted connections shall be visually examined in accordance with the requirements of Table IWE-2500-1, Examination Category E-G, Pressure-Retaining Bolting, Item E8.10;
2. Bolted connections shall meet the pressure test requirements of Table IWE-2500-1, Examination Category E-P, All Pressure-Retaining Components, Item E9.40; and
3. A general visual examination of the entire containment once each inspection period shall be conducted in accordance with 10 CFR 50.55a(b)(2)(ix)(E).

#### **Relief Request Applicability:**

This Relief Request is applicable to the First 10-Year Containment ISI Interval.

#### **Staff Evaluation:**

The Code requires that pressure-retaining bolting that has not been disassembled and reassembled during the inspection interval be torque or tension tested. This examination is used to aid in the determination that a leak-tight seal exists and that the structural integrity of

the subject bolted connections is maintained. The licensee proposed to use the 10 CFR Part 50, Appendix J, Type B test as an alternative to the Code requirement to verify the integrity of penetrations with bolted connections.

The Appendix J, Type B test provides an adequate test to ensure the pressure integrity of the containment pressure seal. Therefore, the licensee's proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that it provides an adequate level of quality and safety.

**Relief Request No.** CRR-3 - Successive Inspection Requirements for Class MC Repair/Replacements, IWE-2420(b) and IWE-2420(c)

**Components for which Relief is Requested:**

This request is applicable to repair/replacements of ASME Code Class MC components.

**ASME Code Class:** MC

**Examination Category:** Not Applicable

**Code Requirement for which Relief is Requested:**

ASME Section XI, 1995 Edition, 1996 Addenda, IWE-2420(b) states, "When examination results require evaluation of flaws or areas of degradation in accordance with IWE-3000, and the component is acceptable for continued service or when the examinations result in performance of a repair/replacement activity, the areas containing such flaws or areas of degradation, or areas subjected to a repair/replacement activity, shall be re-examined during the next inspection period listed in the schedule of the inspection program of IWE-2411 or IWE-2412, in accordance with Table IWE-2500-1, Examination Category E-C." IWE-2420(c) further requires that this augmented reexamination continue for at least three consecutive inspection periods.

**Basis and Justification for the Granting of Relief:**

Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested from the Code requirements stated above (as they apply to repair/replacement activities) on the basis that compliance with this requirement would result in hardship or unusual difficulty without a compensating increase in the level of quality or safety.

The purpose of a repair/replacement is to restore the component to an acceptable condition for continued service in accordance with the acceptance standards of IWE-3000. IWA-4160 requires the owner to conduct an evaluation of the suitability of the repair/replacement including consideration of the cause of failure. This requirement for successive examination presupposes that the repair/replacement was not suitable. If the repair/replacement has restored the component to an acceptable condition, successive examinations are not warranted. If the repair/replacement was not suitable, then the repair/replacement does not meet Code requirements and the component is not acceptable for continued service. Neither IWB-2420(b), IWC-2420(b), nor IWD-2420(b) require a repair/replacement to be subject to

successive examination requirements for ASME Class 1, 2, or 3 components, respectively. The successive examination of repair/replacements in accordance with IWE-2420(b) and IWE-2420(c) constitutes a burden without a compensating increase in quality or safety.

In SECY 96-080, Part II, response to Comment 3.3 regarding IWE-2420, the NRC stated, "The purpose of IWE-2420(b) is to manage components found to be acceptable for continued service (meaning no repair or replacement at this time) as an Examination Category E-C [Containment Surfaces Requiring Augmented Examination] component ... If the component had been repaired or replaced, then more frequent examination would not be needed."

The requirement for reexamination of repair/replacements was removed from IWE-2420(b) and (c) in the 1998 Edition of ASME Section XI.

**Alternative Examination:**

None. Relief is sought only from the requirement to reexamine areas that have undergone repair/replacement activities.

**Relief Request Applicability:**

This Relief Request is applicable to the First 10-Year Containment ISI Interval.

**Staff Evaluation:**

IWB-2420(b), IWC-2420(b), and IWD-2420(b) do not require the successive inspection of repairs for Code Class 1, 2, and 3 components as required in IWE-2420(b) for Class MC components. Additionally, when repairs are complete, IWA-4150 requires licensees to evaluate the suitability of the repair. When a repair is required because an item fails, the evaluation will consider the cause of failure to ensure that the repair is suitable. Considering that the failure mechanism is identified and corrected as required, and that the repair receives preservice examinations as required, the proposed alternative will provide reasonable assurance of structural integrity. Performance of the successive examinations presents an unnecessary burden on the licensee without a compensating increase in the level of quality or safety. Therefore, the licensee's proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The proposed testing provides reasonable assurance of containment leak-tight integrity.

**Relief Request No.** CRR-4 - Illumination and Examination Distance Requirements for Class CC Components

**Components for which Relief is Requested:**

This request is applicable to the illumination and examination distance requirements for remote inspection of ASME Code Class CC concrete components

**ASME Code Class:** CC

**Examination Category:** L-A, Item No. L1.11 all areas and L1.12 suspect areas

**Code Requirement for which Relief is Requested:**

ASME Section XI, 1995 Edition, 1996 Addenda, Subsection IWL-2310 requires specific minimum illumination levels and maximum direct examination distances for the VT-1C and VT-3C examinations of concrete surfaces as outlined in IWA-2210.

**Basis and Justification for the Granting of Relief:**

Relief is requested from the requirements of Table IWL-2310 pursuant to the requirements of 10 CFR 50.55a(a)(3)(i) on the basis that the proposed alternative would provide an acceptable level of quality and safety.

On September 22, 1999, 10 CFR 50.55a was amended in the *Federal Register* to permit the use of the ASME B&PV Code Section XI, 1995 Edition, 1996 Addenda when performing containment examinations. Subsections IWL-2310(a) and IWL-2310(b) require that VT-1C and VT-3C examinations be performed utilizing the lighting and distance requirements outlined in IWA-2210 and Table IWA-2210-1 of the Code. For examinations performed under Subsection IWE, NRC regulations (10 CFR 50.55a(b)(2)(ix)(B)) permit an increase in maximum distance and a decrease in minimum allowable illumination requirements of Table IWA-2210-1 provided that the conditions or indications for which the visual examination is performed can be detected at the chosen distance and illumination.

Inspecting the concrete surfaces using increased distances and decreased illumination, when approved by the responsible engineer and demonstrated to the satisfaction of the authorized nuclear inservice inspector, will allow the detection of flaws of a size sufficient to distinguish a structural problem with the concrete. The requirements for illumination and distance outlined in IWA-2210 and Table IWA-2210 were originally specified to detect flaws on metal surfaces. Flaw detection on metal surfaces requires the ability to resolve much smaller indications than those required on concrete due to the small grain size of metal in comparison to poured concrete.

Additionally, the reference to IWA for examination distance, illumination, and resolution has been removed from the 1998 Edition of the ASME Code Subsection IWL. The term VT-1C examination has been replaced by "Detailed Visual Examination," and VT-3C examination has been replaced by "General Visual Examination." The General Visual Examination of a concrete surface is performed under the direction of the responsible engineer to indicate the general structural condition of the containment. If any deterioration or distress is detected in the performance of the General Visual Examination, the Detailed Visual Examination is performed under the direction of the responsible engineer to determine the magnitude and extent of the deterioration.

**Alternative Examination:**

When performing remote visual examinations, the maximum direct examination distance specified in Table IWA-2210-1 may be extended and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the conditions or indications for

which the visual examination is performed can be detected at the chosen distance and illumination.

The responsible engineer will use a combination of character- and workmanship-based samples to determine the resolution required ensuring that indications of interest are detectable. The responsible engineer will also identify the minimum size for indications of interest. Additionally, the procedure and equipment to be used will be demonstrated capable of resolving these minimum indications to the satisfaction of the responsible engineer and the authorized nuclear inservice inspector. The record of demonstration will be available to the regulatory authorities.

**Relief Request Applicability:**

This relief request is applicable to the First 10-Year Containment ISI Interval.

**Staff Evaluation:**

The purpose of performing VT-3C examinations on the concrete containment based on the requirement specified in IWA-2210 and Table IWA-2210-1 is to determine if the damage or degradation, including cracks, wear, corrosion, erosion, or other physical damage, warrants additional evaluation or repair of the structure. The staff finds that due to the nature of concrete, a concrete containment might have numerous, small “shrinkage-type” surface cracks or other imperfections that are not detrimental to the structural integrity of the containment. The staff also finds that the application of the Code requirement (IWA-2210 and Table 2210-1) for identifying these insignificant “shrinkage-type cracks” or other imperfections is not necessary and could result in a large number of man hours for erecting scaffolding, using lifts, and evaluating insignificant indications. In addition, performance of a visual examination on concrete surfaces using distances and illumination requirements determined by a knowledgeable responsible engineer will provide reasonable assurance of concrete quality. The staff concludes that the licensee’s proposed alternative will provide an acceptable level of quality and safety. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

**Relief Request No.** CRR-5 - Visual Examination Prior to Removal of Class MC Coatings, IWE-2500(b)

**Components for which Relief is Requested:**

This request is applicable to ASME Code Class MC components with coatings.

**ASME Code Class:** MC

**Examination Category:** Not Applicable

**Requirement for which Relief is Requested:**

ASME Section XI, 1995 Edition, 1996 Addenda, IWE-2500(b) requires that when paint or coatings are to be removed, the paint or coatings shall be visually examined in accordance with Table IWE-2500-1 prior to removal.

**Basis and Justification for the Granting of Relief:**

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the Code requirements stated above on the basis that the proposed alternative would provide an acceptable level of quality and safety.

Paint and coatings are not part of the containment pressure boundary under current Code rules as they are not associated with the pressure-retaining function of the component (Ref. ASME Section III, Paragraph NE-2110(b), 1998 Edition). The interior of containment is painted to prevent rusting and to facilitate decontamination. Neither paint nor coatings contribute to the structural integrity or leak tightness of the containment. Additionally, the paint and coatings on the containment pressure boundary were not subject to Code rules when they were originally applied and are not subject to ASME Section XI rules for repair or replacement in accordance with IWA-4120(b)(5).

Degradation or discoloration of the paint or coating materials on containment may be an indicator of potential degradation of the containment pressure boundary. Additional measures would have to be employed to determine the nature and extent of any degradation, if present.

The application of ASME Section XI rules for removal of paint or coatings when unrelated to an ASME Section XI repair or replacement activity, provides no material benefit.

The 1998 Edition of ASME Section XI does not include the requirement to inspect coatings prior to their removal.

**Alternative Examination:**

The condition of the containment vessel base material will be verified prior to the application of new paint or coating as required by the station coating procedure. If degradation is identified, additional measures will be applied to determine if the containment pressure boundary is affected. Repairs to the primary containment boundary, if required, will be conducted in accordance with ASME Section XI Code rules.

**Relief Request Applicability:**

This relief request is applicable to the First 10-Year Containment ISI Interval.

**Staff Evaluation:**

The purpose of performing the visual examination per IWE-2500(b) is to identify any evidence of base metal degradation prior to removal of the coating or paint. As an alternative to the requirements of IWE-2500(b), the licensee has proposed to inspect the coatings, including paints, using its protective coating program. The licensee informed the staff that the protective coating program by Seabrook has been written to comply with the applicable requirements of Regulatory Guide 1.54 and other American National Standards Institute (ANSI) Codes such as ANSI N101.4. Section 6 of ANSI N101.4 requires stringent inspection of the entire completed coating work by qualified coating inspection personnel, as well as quality assurance documentation. Seabrook's Updated Final Safety Analysis Report (UFSAR) further discusses compliance of the coating program with RG 1.54. The licensee states that degradation of the

base metal would be identified at this time and that corrective actions would be initiated prior to the reapplication of the coating or paint. Based upon the licensee's verification of sound base metal prior to application of new coatings, the staff considers the proposed alternative, as stated by the licensee, adequate for protecting the containment surfaces. Therefore, the licensee's proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that it provides an acceptable level of quality and safety.

**Relief Request No.** CRR-6 - Preservice Examination of Reapplied Class MC Coatings, IWE-2200(g)

**Components for which Relief is Requested:**

This request is applicable to ASME Code Class MC components with coatings.

**ASME Code Class:** MC

**Examination Category:** Not Applicable

**Code Requirement for which Relief is Requested:**

ASME Section XI, 1995 Edition, 1996 Addenda, IWE-2200(g) requires that when paint or coatings are reapplied, the condition of the new paint or coating shall be documented in the preservice examination records.

**Basis and Justification for the Granting of Relief:**

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the Code requirements stated above on the basis that the proposed alternative would provide an acceptable level of quality and safety.

Paint and coatings are not part of the containment pressure boundary under current Code rules. Because they are not associated with the pressure-retaining function of the component, neither paint nor coatings contribute to the structural integrity or leak tightness of the containment (Ref. ASME Section III, NE-2110(b), 1998 Edition). Furthermore, the paint and coatings on the containment pressure boundary were not subject to Code rules when they were originally applied and are not subject to ASME Section XI rules for repair or replacement in accordance with IWA-4120(b)(5). The adequacy of applied coatings is verified periodically during 10 CFR 50.65 Maintenance Rule inspections. Recording the condition of reapplied coating in the preservice record does not substantiate the containment structural integrity. Should deterioration of the coating in the reapplied area occur, the area would require additional evaluation regardless of the preservice record.

Recording the condition of new paint or coatings in the preservice records does not increase the level of quality and safety of the containment. SECY 96-080, Part II, response to Comment 3.2 about IWE-2200(g) states, "In the NRC's opinion, this does not mean that a visual examination must be performed with every application of paint or coating. A visual examination of the topcoat to determine the soundness and the condition of the topcoat should be sufficient." This is currently accomplished in accordance with the 10 CFR 50.65 Maintenance Rule inspections of the primary containment.

The 1998 Edition of ASME Section XI does not include the requirement to perform a preservice examination when paint or coatings are reapplied.

**Alternative Examination:**

The paint or coatings in the containment will be examined in accordance with the 10 CFR 50.65 Maintenance Rule inspections of the primary containment. If degradation of the coating is identified, additional measures will be applied to determine if the containment pressure boundary is affected. Although repairs to paint or coatings are not subject to the Repair/Replacement rules of ASME Section XI (Interpretations Volume 42, XI-1-98-14, Question No. 2), repairs to the primary containment boundary, if required, would be conducted in accordance with ASME Section XI Code rules.

**Relief Request Applicability:**

This relief request is applicable to the First 10-Year Containment ISI Interval.

**Staff Evaluation:**

In the basis for the relief request, the licensee states that it has established the appropriate controls for the coating applications associated with the interior and exterior surfaces of the primary containment structure. These controls are contained in a plant procedure that covers (1) materials to be used, (2) application methods, (3) inspection, (4) personnel qualification, (5) repair, and (6) documentation. The plant procedure is written to comply with the applicable requirements of RG 1.54, ANSI N5.12, ANSI N101.2, and ANSI N101.4. The licensee's Protective Coatings Program provides a conservative approach to the inspection and documentation of new coatings and as such, the staff concludes that the proposed alternative provides an acceptable level of quality and safety. Therefore, the licensee's proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

**2.0 CONCLUSION**

Based on the information provided in the relief requests, the staff concludes that for Relief Requests CRR-1, 4, 5, and 6, the licensee's proposed alternatives will provide an acceptable level of quality and safety. Therefore, the proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(i). For Relief Requests CRR-2 and 3, the staff concludes that compliance with the Code requirements would result in hardship without a compensating increase in the level of quality and safety, and that the licensee's proposed alternatives will provide reasonable assurance of containment pressure integrity. Therefore, the proposed alternatives are authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

**3.0 REFERENCE**

1. Letter, Ted C. Feigenbaum, North Atlantic Energy Service Corporation, "Primary Containment Inservice Inspection Relief Request," Seabrook Station, dated April 25, 2000.

Principal Contributor: M. Kotzalas

Date: August 18, 2000

Seabrook Station, Unit No. 1

cc:

Lillian M. Cuoco, Esq.  
Senior Nuclear Counsel  
Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270

Mr. Peter Brann  
Assistant Attorney General  
State House, Station #6  
Augusta, ME 04333

Resident Inspector  
U.S. Nuclear Regulatory Commission  
Seabrook Nuclear Power Station  
P.O. Box 1149  
Seabrook, NH 03874

Town of Exeter  
10 Front Street  
Exeter, NH 03823

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Office of the Attorney General  
One Ashburton Place  
20th Floor  
Boston, MA 02108

Board of Selectmen  
Town of Amesbury  
Town Hall  
Amesbury, MA 01913

Mr. Dan McElhinney  
Federal Emergency Management Agency  
Region I  
J.W. McCormack P.O. &  
Courthouse Building, Room 401  
Boston, MA 02109

Mr. Stephen McGrail, Director  
ATTN: James Muckerheide  
Massachusetts Emergency Management  
Agency  
400 Worcester Road  
Framingham, MA 01702-5399

Philip T. McLaughlin, Attorney General  
Steven M. Houran, Deputy Attorney  
General  
33 Capitol Street  
Concord, NH 03301

Mr. Woodbury Fogg, Director  
New Hampshire Office of Emergency  
Management  
State Office Park South  
107 Pleasant Street  
Concord, NH 03301

Mr. Roy E. Hickok  
Nuclear Training Manager  
Seabrook Station  
North Atlantic Energy Service Corp.  
P.O. Box 300  
Seabrook, NH 03874

Mr. James M. Peschel  
Manager - Regulatory Programs  
Seabrook Station  
North Atlantic Energy Service Corp.  
P.O. Box 300  
Seabrook, NH 03874

Mr. W. A. DiProfio  
Station Director  
Seabrook Station  
North Atlantic Energy Service Corporation  
P.O. Box 300  
Seabrook, NH 03874

Mr. Frank W. Getman, Jr.  
President and Chief Executive Officer  
BayCorp Holdings, LTD  
20 International Drive, Suite 301  
Portsmouth, NH 03801-6809

Mr. B. D. Kenyon  
President and Chief Executive Officer  
Northeast Utilities Service Company  
P.O. Box 270  
Hartford, CT 06141-0270

Mr. Ted C. Feigenbaum  
Executive Vice President and  
Chief Nuclear Officer  
Seabrook Station  
North Atlantic Energy Service Corporation  
c/o James M. Peschel  
P.O. Box 300  
Seabrook, NH 03874

Mr. Steve Allen  
Polestar Applied Technology, Inc.  
77 Franklin Street, Suite 507  
Boston, MA 02110