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Docket Nos. 50-321
50-366

HL-5955

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

**Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program
Submittal of Modified Request for Relief**

Ladies and Gentlemen:

This letter is to submit modified Request for Relief No. RR-MC-7 for the Third 10-Year Interval Inservice Inspection Program for the Edwin I. Hatch Nuclear Plant. The Request for Relief was originally submitted in a letter dated April 14, 2000. The enclosed relief request was modified to clearly define the certification requirements of the Containment Inspection Program upon its concurrent update with the ISI Program. Please disregard the previously submitted Request for Relief RR-MC-7 and consider the attached version for granting relief.

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

Respectfully submitted,

A handwritten signature in black ink that reads "Lewis Sumner". The signature is written in a cursive, flowing style.

H. L. Sumner, Jr.

DRG/IFL

Attachment: Request for Relief No. RR-MC-7.

cc: Southern Nuclear Operating Company
Mr. P. H. Wells, Nuclear Plant General Manager
SNC Document Management (R-Type A02.001)

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

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

A047

Attachment

Edwin I. Hatch Nuclear Plant
Third 10-Year Interval Inservice Inspection Program

Request for Relief No. RR-MC-7

SOUTHERN NUCLEAR OPERATING COMPANY
PLANT HATCH, UNITS 1 & 2
THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM
REQUEST FOR RELIEF NO. RR-MC-7

- I. System/Component(s) for Which Relief Is Requested: All Class MC, Paragraph IWA-2310 requirements for qualification of nondestructive examination (NDE) personnel.
- II. Code Requirement: 10 CFR 50.55a(g)(6)(II)(B) requires that containment inspections be conducted in accordance with the 1992 Edition, with 1992 Addenda of ASME Code Section XI. IWA-2310 of the 1992 Edition, 1992 Addenda requires personnel performing NDE to be qualified and certified in accordance with ANSI/ASNT CP-189.
- III. Code Requirement from Which Relief is Requested: Requirements of Paragraph IWA-2310 which requires NDE personnel to be qualified and certified using a written practice in accordance with ANSI/ASNT CP-189, Standard for Qualification and Certification of Nondestructive Testing Personnel, as amended by the requirements of this division.
- IV. Basis for Relief: 10 CFR 50.55a was amended in the Federal Register to require the use of the 1992 Edition, with the 1992 Addenda of the ASME Code, Section XI when performing containment examinations. In addition to the requirements of IWE/IWL, the requirements of subsection IWA of the 1992 Edition, 1992 Addenda of the ASME Code, Section XI for containment examinations were imposed. IWA-2300 requires qualification of NDE personnel to ANSI/ASNT CP-189.

Currently, the Edwin I. Hatch Nuclear Plant (HNP) Inservice Inspection (ISI) Program requirements for nondestructive testing personnel are written based upon the 1984 Edition of ASNT SNT-TC-1A, as required by the 1989 Edition of the ASME Code, Section XI, which is the HNP code of record. Compliance with the 1992 ASME Code requirements from which relief is requested necessitates establishing a separate and parallel qualification and certification program, and duplicating a significant portion of existing procedural controls.

Visual examination is the primary nondestructive method required by Subsections IWE and IWL. Neither ANSI/ASNT CP-189 nor ASNT SNT-TC-1A specifically includes visual examination. Therefore, the Code requires qualification and certification to comparable levels as in ANSI/ASNT CP-189 or ASNT SNT-TC-1A, as applicable, and the employer's written practice. The requirements within ANSI/ASNT CP-189 and ASNT SNT-TC-1A for those methods and levels comparable to visual examination are similar. Ultrasonic thickness examinations may also be required by Table IWE-2500-1. Technically, these examinations are relatively simple and do not require an extensive training and qualification program. The alternative to use the 1984 Edition of ASNT SNT-TC-1A for the qualification of NDE personnel for ISI of Class MC and Class CC containments in lieu of the requirements of IWA-2310 is equivalent to the requirements applicable to the HNP ISI Program Class 1, 2, and 3 components. Therefore, the use of ANSI/ASNT CP-189 in place of ASNT SNT-TC-1A will not significantly improve the capability of NDE to perform the examinations required by IWE.

- V. Alternate Examination: HNP will use the 1984 Edition of ASNT SNT-TC-1A for the qualification and certification of NDE personnel for ISI of Class MC and Class CC containments in lieu of ANSI/ASNT CP-189 until the update of the HNP ISI Program for the Fourth 10-Year ISI Interval beginning on January 01, 2006. Concurrent with the ISI Program update, HNP will revise the Containment Inspection Program to require the personnel performing NDE to be qualified and certified using a written practice prepared in accordance with article IWA-2300 of the HNP Fourth Ten Year Interval Section XI code of record. IWA-2300 requires the written practice to be prepared in accordance with ANSI/ASNT CP-189 as amended by the requirements of this Division. IWA-2300 also requires recertification of NDE personnel in accordance with the edition of ANSI/ASNT CP-189 referenced in IWA-1600 as amended by the requirements of this Division.
- VI. Justification for Granting Relief: Implementing and maintaining two separate administrative programs, one for Class 1, 2, and 3 systems and components based upon ASNT SNT-TC-1A, and another solely for Class MC structures, systems, and components based upon ANSI/ASNT CP-189 could result in HNP developing a second written practice, adding difficulty in tracking of certification, and a duplication of paperwork. Further, since the HNP ISI Program requirements for qualifying and certifying NDE personnel are based upon the 1984 Edition of ASNT SNT-TC-1A and provide reasonable assurance of qualified examiners for Class 1, 2, and 3 components, the use of these NDE personnel to perform containment examinations will provide an acceptable level of quality and safety. Therefore, Southern Nuclear Operating Company requests that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).
- VII. Implementation Schedule:
- This relief request will be implemented in accordance with the expedited examination schedule for MC components as specified in 10 CFR 50.55a(g)(6)(ii)(B) during the Third 10-Year ISI Interval.
- VIII. Relief Request Status: Submitted to NRC for review and approval.