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July 31, 2000

SVP-00-127

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

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Relief Request PR-13

Reference: Letter from J.P. Dimmette, Jr. (ComED) to USNRC, "Relief Requests CR-14, CR-27, CR-28, CR-29, PR-10, PR-11, PR-12, and PR-13," dated July 25, 1999.

The purpose of this letter is to amend relief request PR-13 transmitted in the referenced letter. During discussions with the NRC staff it was decided that additional information was needed to complete NRC review of relief request PR-13. Attached to this letter is amended relief request PR-13 which provides the additional information.

Approval of the attached relief request is needed prior to the start of Q1R16, which is currently scheduled for October 14, 2000.

Should you have any questions concerning this letter, please contact Mr. C.C. Peterson at (309) 654-2241, extension 3609.

Respectfully,

A handwritten signature in cursive script, reading "Joel P. Dimmette, Jr.", followed by a horizontal line.

Joel P. Dimmette, Jr.
Site Vice President
Quad Cities Nuclear Power Station

Attachment: Relief Request PR-13 Revision 1

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

A047

RELIEF REQUEST NUMBER: PR-13

REVISION 1

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COMPONENT IDENTIFICATION

Code Class:	1, 2, and 3
Reference:	IWA-2300
Examination Category:	N/A
Item Number:	N/A
Description:	Alternative Requirements for Qualification of VT-2 Examination Personnel.
Component Numbers:	Class 1, 2, and 3 Pressure Retaining Components.

CODE REQUIREMENTS

Section XI, Subarticle IWA-2300 and Paragraph IWA-2312 require personnel performing nondestructive examinations not listed in SNT-TC-1A to be qualified and certified to a comparable level of qualification as defined in SNT-TC-1A and the Employer's written practice.

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis the proposed alternatives would provide an acceptable level of quality and safety.

Section XI currently requires personnel conducting VT-2 examinations to be qualified and certified to comparable levels of qualification as defined in SNT-TC-1A and the Employer's written practice. However, unlike the nondestructive testing methods addressed within SNT-TC-1A, or VT-1 and VT-3 examination methods, VT-2 examination does not require any special knowledge of technical principals underlying its performance. It is only the straight forward examination for leakage. No special skills or technical training are required in order to observe water dripping from a component or bubbles forming on a joint wetted with leak detection solution. As such, VT-2 personnel should not be subject to the same qualification and certification requirements that were established for nondestructive testing personnel. Code Case N-546 provides more applicable requirements for the qualification and certification of VT-2 inspection personnel.

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BASIS FOR RELIEF (Con't)

Code Case N-546 requires that personnel performing VT-2 visual examinations have at least forty (40) hours of plant walkdown experience, receive a minimum of four (4) hours of training on Section XI requirements, and pass the vision test requirements of IWA-2321, 1995 Edition. This alternative to the existing Code requirements reduces the administrative burden of maintaining a Section XI qualification and certification program for VT-2 examiners and allows for the use of personnel most familiar with the walkdown of plant systems, such as licensed and nonlicensed operators, local leak rate personnel, system engineers, and NDE personnel to perform VT-2 visual inspections. The quality of VT-2 visual examinations will be maintained by using the alternate qualification rules approved by ASME in Code Case N-546.

Code Case N-546 was approved by the ASME Boiler and Pressure Vessel Code Committee on August 24, 1995, but is not yet included in the most recent listing of NRC approved code cases provided in Revision 11 of Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division 1".

PROPOSED ALTERNATE PROVISIONS

Quad Cities Nuclear Power Station will use the provisions of Code Case N-546 as alternatives to the requirements of Section XI, IWA-2300 for qualifying VT-2 visual inspectors. In addition, Quad Cities Nuclear Power Station will qualify examination personnel by test to demonstrate knowledge of Section XI and plant specific procedures for VT-2 visual examination. Examination personnel will re-qualify in accordance with the frequency specified in IWA-2314.

APPLICABLE TIME PERIOD

Relief is requested for the third ten-year interval of the Inservice Inspection Program for Quad Cities Units 1 and 2.