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August 30, 2000

Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL-00-112

Document Control Desk  
US Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, DC 20555-0001

Subject: Relief Request to Allow Use of ASME Code Case N-546 (Relief  
Request No. 56)

Reference: NRC Letter to South Texas Project Nuclear Operating Company,  
"South Texas Project, Units 1 and 2 (STP) – Second 10-Year Interval  
Inservise Inspection Program Plan – Request to Use ASME Section  
XI Code Case N-546 (Relief Request RR-ENG-2-9) (TAC Nos.  
MA5451 and MA5452)

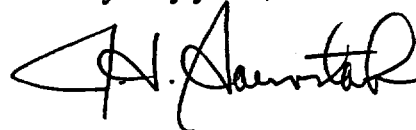
Pursuant to 10 CFR 50.55a(a)(3), Consolidated Edison Company of New York, Inc. (Con Edison) hereby requests relief from certain requirements of the American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel Code for Indian Point Unit 2. Specifically, relief is requested to allow the use of ASME Code Case N-546 instead of the qualification and certification requirements for VT-2 visual examination personnel found in IWA-2300. The NRC staff approved a similar relief request for the South Texas Project (Reference). Attachment I contains the basis for this relief request.

No new regulatory commitments are being made by Con Edison in this correspondence.

Should you or your staff have any questions regarding this matter, please contact Mr. John McCann, Manager, Nuclear Safety & Licensing.

Very truly yours,

Attachment



A047

C: Mr. Hubert J. Miller  
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**ATTACHMENT I**

**Relief Request No. 56**

**Consolidated Edison Company of New York, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247  
August 2000**

**RELIEF REQUEST NUMBER 56**

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**REFERENCE CODE:** American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, 1989 Edition with no Addenda. IWA-2310

**COMPONENTS FOR WHICH RELIEF IS REQUESTED:**

Components subject to VT-2 visual examinations.

**CURRENT CODE REQUIREMENTS AND REQUEST FOR RELIEF:**

Pursuant to 10 CFR 50.55a(a)(3)(i), Consolidated Edison is requesting relief from the ASME Section XI, Subsection IWA-2300 requirements for the qualification and certification of VT-2 visual examination personnel.

As an alternative, Consolidated Edison proposes to use the alternate requirements in Code Case N-546, which provides an acceptable level of quality and safety.

**BASIS FOR RELIEF:**

ASME Section XI, 1989 Edition, Subsection IWA-2300 requires that VT-2 visual examination personnel be qualified to and certified in accordance with ASNT SNT-TC-1A. The Code also requires that the examination personnel be qualified for near and far distance vision acuity. This relief request proposes to use ASME Code Case N-546 which contains alternate requirements for the certification and qualification of VT-2 visual examination personnel. Consolidated Edison believes that this alternative is acceptable pursuant to 10 CFR 50.55a(a)(3)(i) as it will provide an acceptable level of quality and safety.

As stated in Code Case N-546, plant personnel (e.g., licensed and non-licensed operators, system engineers, and testing technicians) with the specific training and plant walkdown experience need not be qualified nor certified to ASNT SNT-TC-1A or ASNT CP-189 requirements. Experience in identifying equipment problems and knowledge of operating conditions will enhance the ability of plant personnel to locate leakage during VT-2 examinations. With the specified four hours of training on Section XI requirements and plant specific procedures for VT-2 examinations, the designated plant personnel will understand how leaks should be identified and documented and be fully capable of performing VT-2 examinations.

Qualifying personnel for VT-2 examinations under Code Case N-546 is less burdensome than qualifying and maintaining the present VT-2 certification. Adopting this Code Case makes it feasible to train more people to perform these tasks. Furthermore, using personnel who are

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already required to perform functions in the plant will reduce the number of people required to enter into those areas that have radiological restrictions, resulting in fewer plant workers being exposed to potential radiation dose and keeping radiation exposure as low as reasonably achievable. Additionally, use of on-shift personnel will improve the process of returning systems to service. Prompt return of safety systems to service will improve the safety of the plant and reduce risk to the public.

**PROPOSED ALTERNATIVE EXAMINATIONS:**

Consolidated Edison proposes the following alternative qualification requirements for VT-2 visual examination personnel:

- a) At least 40 hours of plant walkdown experience, such as that gained by licensed and non-licensed operators, local leak rate personnel, system engineers, and inspection and nondestructive examination personnel;
- b) At least four hours of training on Section XI requirements and plant specific procedures for VT-2 visual examination; and
- c) Vision test requirements of IWA-2321, 1995 Edition.

**PERIOD FOR WHICH RELIEF IS REQUESTED:**

Relief is requested for the remainder of the third inspection interval, July 1, 1999 through June 30, 2004. Furthermore, this interval has been extended to May 18, 2005 as discussed in Con Edison Letter to USNRC dated April 9, 1999.