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November 30, 2000
NMP1L 1551

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Subject: Third Ten-Year Interval Relief Request ISI-13, Revision 1 (TAC No. MB0175)

Gentlemen:

By letter dated September 21, 2000, Niagara Mohawk Power Corporation (NMPC) submitted Relief Request ISI-13 for Nine Mile Point Unit 1. ISI-13 requested use of an alternative to the American Society of Mechanical Engineers Code minimum percentage requirements for examination of certain weld categories delineated in Tables IWB-2412-1 and IWC-2412-1 of Inspection Program B for the first inspection period of the third ten-year inservice inspection interval.

On November 2, 2000, a telephone discussion took place between the NRC staff and NMPC regarding references to Generic Letter (GL) 88-01 augmented examinations included in ISI-13. Based on this discussion, NMPC agreed to remove GL 88-01 examinations from the relief request. Accordingly, Revision 1 to ISI-13 is attached for your review. Because implementation of ISI-13, Revision 1, will provide an acceptable level of quality and safety, NMPC requests that the NRC approve this relief request, pursuant to 10 CFR 50.55a(a)(3)(i), no later than February 1, 2001.

Sincerely,

Richard B. Abbott
Vice President Nuclear Engineering

RBA/JJD/cld
Attachment

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Gamberoni, Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR
Records Management

A047

ATTACHMENT

**NINE MILE POINT UNIT 1
THIRD INSERVICE INSPECTION INTERVAL
RELIEF REQUEST ISI-13, Revision 1**

A. COMPONENT IDENTIFICATION

System: Various Systems

Class: Quality Group A, and B (ASME Code Class 1 and 2)

Component Description: Piping Circumferential Welds

B. ASME SECTION XI EXAMINATION REQUIREMENTS

American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel Code (B&PVC), Section XI, Table IWB-2500-1 and IWC-2500-1, Examination Categories B-F, B-J, C-F-1, and C-F-2 welds. The required examinations in each Examination Category shall be completed during each successive inspection interval in accordance with Inspection Program "B", Tables IWB-2412-1 and IWC-2412-1, as defined in Table 1 below.

| Table 1 ASME Section XI Examination Requirements | | | | |
|---|----------------------|-----------------------------|--------------------------------------|-------------------------|
| ASME Code Class | Examination Category | Total Circumferential Welds | Total Circumferential Welds Required | Percentage Requirements |
| 1 | B-F | 39 | 38 | 100% Required * |
| 1 | B-J | 591 | 148 | 25% Required |
| 2 | C-F-1 | 72 | 28 | 7.5% Required |
| 2 | C-F-2 | 758 | 57 | 7.5% Required |

* Weld 33-WD-014 is inaccessible and addressed in Request for Relief ISI-12.

C. RELIEF REQUESTED

Pursuant to 10 CFR 50.55a(a)(3)(i), Niagara Mohawk Power Corporation (NMPC) requests relief from the minimum examination requirements specified in Tables IWB-2412-1 and IWC-2412-1 of the ASME B&PVC, Section XI, Division 1, for the First Inservice Inspection Period, (December 26, 1999 to December 25, 2002), as defined below in Table 2.

| Table 2 Inspection Program B | | | |
|---|---|-----------------------------------|----------------------------------|
| Inspection Interval | Inspection Period Calendar Years of Plant Service | Minimum Examinations Completed, % | Maximum Examinations Credited, % |
| 3 RD Inservice Inspection Interval | 23 | 16 | 34 |
| | 27 | 50 | 67 |
| | 30 | 100 | 100 |

Reference: Tables IWB-2412-1 and IWC-2412-1

**NINE MILE POINT UNIT 1
THIRD INSERVICE INSPECTION INTERVAL
RELIEF REQUEST ISI-13, Revision 1**

In addition, NMPC requests a delay of 2 years from December 26, 1999, or through refueling outage (RFO)-16, whichever is later, for conforming to the piping weld examination requirements of the 1989 Edition of the ASME Code, Section XI, for the Third Ten-Year Inservice Inspection Interval at Nine Mile Point Unit 1 (NMP1), as allowed in USNRC Information Notice 98-44.

D. BASIS FOR RELIEF

The Updated Inservice Inspection Program, Plan, and schedule for NMP1 Third Inservice Inspection Interval was submitted to the USNRC Staff on October 30, 1999.

The first NMP1 refueling outage of the third interval (RFO-16) is scheduled to begin in March 2001. This request for relief would provide for the elimination of ASME Code Class 1 and 2 piping weld examinations that may no longer be required once NMP1's Risk-Informed Inservice Inspection (RI-ISI) Program for piping is implemented.

All required augmented examinations, as required by GL 88-01, will be performed as scheduled during RFO-16.

In Information Notice 98-44, the USNRC Staff stated that the performance of augmented examinations would be unaffected by USNRC approved delays in updating ISI programs to accommodate development of risk-informed ISI Programs. Accordingly augmented examinations are unaffected by this request for relief.

USNRC Information Notice 98-44, titled "Ten Year Inservice Inspection (ISI) Program Update for Licensees that Intend to Implement Risk-Informed ISI of Piping," states that the probabilistic risk assessment technology in USNRC regulatory activities should be increased to the extent supported by state of the art methods and data and in a manner that complements the USNRC's deterministic approach. Basically, this information combined with risk-assessment techniques and associated data, can be used to develop a more effective approach to the ISI program, specifically the piping. This program is practical and provides an acceptable level of quality and safety, as required by 10 CFR 50.55a(a)(3)(i).

E. ALTERNATIVE EXAMINATIONS

In accordance with 10 CFR 50.55a(a)(3)(i), NMPC proposes an alternative to the examination percentage requirements of Inspection Program B. Specifically, NMPC proposes to develop the RI-ISI program in accordance with ASME Code Case N-578, utilizing the EPRI methodology applied to ASME Code Class 1, 2 and 3 piping and in accordance with EPRI TR 112657 and Regulatory Guide 1.178. When the RI-ISI Program is established, all examinations required by the risk-informed methodology would be accomplished by the end of the Third Ten-Year Inservice Inspection Interval that is scheduled for completion on December 25, 2009.

NMPC plans to develop and implement a RI-ISI methodology for RFO-17 in March-April of 2003.

F. IMPLEMENTATION SCHEDULE

Third Inservice Inspection Interval, First Inspection Period, December 26, 1999 to December 25, 2002.

Submit RI-ISI Program no later than February 2002, for implementation in the Second Inservice Inspection Period, RFO-17.

G. ATTACHMENTS

None