January 24, 2001

Mr. Dale E. Young, Vice President
Crystal River Nuclear Plant (NA1B)
ATTN: Supervisor, Licensing & Regulatory Programs
15760 W. Power Line Street
Crystal River, Florida 34428-6708

SUBJECT: CRYSTAL RIVER 3 - EVALUATION OF THIRD 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM REQUEST FOR RELIEF NO. 00-002-II (TAC NO. MA9926)

Dear Mr. Young:

In a letter dated August 24, 2000, Florida Power Corporation (FPC) requested, pursuant to Title 10, *Code of Federal Regulations* (10 CFR) Section 50.55a(a)(3)(i), that the U.S. Nuclear Regulatory Commission (NRC) authorize the use of the requirements of 10 CFR 50.55a(b)(2)(xiv) in lieu of the provisions of the 1989 Edition of the American Society of Mechanical Engineers (ASME) Code, Section XI, Appendix VII, Paragraph VII-4240, Annual Training.

The NRC staff has evaluated your request and has determined that the alternative to the ASME Section XI annual training requirements of ultrasonic testing personnel will provide an acceptable level of quality and safety. Accordingly, the alternative contained in RR-00-002 is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for Crystal River Unit 3 during the third 10-year interval. A copy of the NRC's safety evaluation is enclosed.

If you have any questions, please contact John Goshen at 301-415-1437.

Sincerely,

/RA by R. Martin Acting for/

Richard P. Correia, Chief, Section 2
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-302

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO REQUEST FOR RELIEF RR-00-002-II

FLORIDA POWER CORPORATION

CRYSTAL RIVER UNIT 3

DOCKET NUMBER 50-302

1.0 INTRODUCTION

The inservice inspection of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Class 1, Class 2, and Class 3 components will be performed in accordance with Section XI of the ASME Code and applicable edition and addenda as required by Title 10, *Code of Federal Regulations* (10 CFR), Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). It states, in part, in 10 CFR 50.55a(a)(3) that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if the licensee demonstrates that: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) will meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The inservice inspection Code of record for Crystal River, Unit 3, third 10-year interval is the 1989 Edition of the ASME Code. The components (including supports) may meet the requirements set forth in subsequent editions and addenda of the ASME Code incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein and subject to Commission Approval.

By letter dated August 24, 2000, Florida Power Corporation, the licensee, proposed using the annual training requirements specified in 10 CFR 50.55a(b)(2)(xiv) in lieu of the annual training requirements specified in Subarticle VII-4240 to Appendix VII of Section XI of the Code.

Enclosure

2.0 ANNUAL ULTRASONIC TESTING (UT) RETRAINING

2.1 Components for which Relief is Requested

All ASME Class 1 and 2 components subject to UT in accordance with the supplements to Appendix VIII to the 1995 Edition with 1996 Addenda of Section XI of the Code.

2.2 Code Requirements for which Relief is Requested

Pursuant to 10 CFR 50.55a(a)(3)(i), the licensee is requesting relief from the 1989 and the 1995 Edition with 1996 Addenda, Appendix VII to Section XI of the Code, Subarticle VII-4240 for Appendix VIII qualified UT personnel. Subarticle VII-4240 requires a minimum of 10 hours of annual UT training. The request for relief RR-00-002-II, is for the third 10-year inservice inspection interval.

2.3 Licensee's Proposed Alternative to Code

The licensee's proposed alternative is to conduct annual UT training in accordance with 10 CFR 50.55a(b)(2)(xiv) requirements in lieu of Subarticle VII-4240 to Appendix VII of Section XI of the 1989 Edition and the 1995 Edition with 1996 Addenda of the Code.

2.4 Evaluation

Subarticle VII-4240, Appendix VII of Section XI of the Code requires 10 hours of annual training to impart knowledge of new developments, material failure modes, and any pertinent technical topics as determined by the licensee. No hands-on training or practice is required to be included in the 10 hours of training. This training is required of all UT personnel qualified to perform examinations of ASME Code Class 1, 2, and 3 systems. Independent of the ASME Code, 10 CFR 50.55a(b)(2)(xiv) imposes the requirement that 8 hours of hands-on training with flawed specimens containing cracks be performed no earlier than 6 months prior to performing examinations at a licensee's facility. The licensee contends that maintaining two separate UT annual training programs create confusion, redundancies, and extra paper work.

As part of the staff's rulemaking effort to revise 10 CFR 50.55a(b)(2), the issue of UT annual training requirements was reviewed. This review was included in the summary of comments to the rule 64 *FR* 51370. In the review, the staff determined that the 10 hours of annual training requirement specified in the ASME Code was inadequate for two reasons. The first reason was that the training does not require practice with flawed specimens. Practice with flaws is necessary because signals can be difficult to interpret. The second reason is related to the length of training and its frequency. Studies have shown that an examiner's capability begins to diminish within 6 months if skills are not maintained. Therefore, examiners must practice on a frequent basis to maintain their capability for proper interpretation of flaws.

Based on resolution of public comments for the above rulemaking, the staff accepted an industry initiative advanced by the Electric Power Research Institute (EPRI), which proposed 8 hours of hands-on practice with flawed specimens containing cracks. The practice would

occur no earlier than 6 months prior to performing examinations at a licensee's facility. The initiative was adopted in 10 CFR 50.55a(b)(2)(xiv) for personnel maintaining their Appendix VIII qualifications. The staff believes that the proposed alternative to use 10 CFR 50.55a(b)(2)(xiv) in lieu of Subarticle VII-4240 will maintain the skill and proficiency of UT personnel at or above the level provided in the Code for annual UT training, thereby, providing an acceptable level of quality and safety.

2.4 Conclusion

Based on the discussion above, the staff concludes that the proposed alternative annual training requirements of UT personnel will provide an acceptable level of quality and safety. Pursuant to 10 CFR 50.55a(a)(3)(i), the proposed alternative RR-00-002, is authorized during the third 10-year interval.

Principal Contributor: J. Goshen, NRR

Date: January 24, 2001

Mr. Dale E. Young
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CRYSTAL RIVER UNIT NO. 3

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