



March 16, 2001
LIC-01-0023

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

- References:
1. Docket No. 50-285
 2. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, Subsection IWA-2300, 1989 Edition
 3. ASME Section XI Code Case N-546, Alternative Requirements for Qualification of VT-2 Examination Personnel Section XI, Division 1, approval date August 24, 1995
 4. Nuclear Regulatory Commission (NRC) Letter to Mr. William T. Cottle, South Texas Project Nuclear Operating Company, "South Texas Project, Units 1 and 2 (STP) – Second 10 Year Interval Inservice Inspection Program Plan – Request to Use ASME Section XI Code Case N-546 (RR-ENG-2-9) (TAC Nos. MA5451 and MA5452)," dated July 8, 1999

SUBJECT: Relief Request to Allow Use of ASME Code Case N-546

Pursuant to the provisions specified in 10 CFR 50.55a(g)(5)(iii) and in accordance with the provisions of 10 CFR 50.55a(a)(3)(i), the Omaha Public Power District (OPPD) requests relief from certain requirements of the ASME Boiler and Pressure Vessel Code. 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 ASME Code Section XI, Subsection IWA-2300, 1989 Edition. The attached relief request contains a proposed alternative to IWA-2300 that will provide an acceptable level of quality and safety. The NRC staff approved a similar relief request for the South Texas Project (Reference 4).

The Attachment contains the basis for this relief request. Currently, Fort Calhoun Station (FCS) is in the Third Ten Year Inservice Inspection (ISI) Interval.

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FCS intends to implement Code Case N-546 during this interval. Therefore, OPPD requests disposition of this relief request prior to July 1, 2001.

A handwritten signature in black ink, appearing to read 'S. K. Gambhir', with a long horizontal stroke extending to the right.

S. K. Gambhir
Division Manager
Nuclear Operations

SKG/dls

Attachment

- c: E. W. Merschoff, NRC Regional Administrator, Region IV
L. R. Wharton, NRC Project Manager
W. C. Walker, NRC Senior Resident Inspector
B. E. Casari, Director - Environmental Health Division, State of Nebraska
Winston & Strawn

**FORT CALHOUN STATION
THIRD INSERVICE INSPECTION INTERVAL
RELIEF REQUEST TO ALLOW USE OF ASME CODE CASE N-546**

I. Reference Code:

ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition with no Addenda.

II. Components for Which Exemption is Requested:

ASME Code Class 1, 2, and 3 components subject to VT-2 visual examinations.

III. Relief Requested:

In accordance with the provisions of 10 CFR 50.55a(a)(3)(i), OPPD is requesting relief from the ASME Section XI, Subsection IWA-2300, 1989 Edition requirements for qualification and certification of personnel performing VT-2 visual examinations.

IV. Basis for Relief:

ASME Section XI, Subsection IWA-2300 requires that VT-2 visual examination personnel be qualified in accordance with comparable levels of competency as defined in ANSI N45.2.6. 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. OPPD 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, testing personnel) with the specified training and plant walkdown experience need not be qualified nor certified to comparable levels of competence in accordance with ANSI N45.2.6. 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 ASME 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.

Adopting Code Case N-546 makes it feasible to train more people to perform VT-2 examinations. Furthermore, using personnel who are already required to perform functions in the plant will reduce the number of people required to enter into areas that

may be radiologically restricted, resulting in fewer plant workers 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 plant equipment availability rates and contribute to enhanced safety of the plant and the public.

V. Alternative Qualification Requirements:

OPPD 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. Documentation of the walkdown experience is a one-time effort and will be maintained in the personnel qualification records.
- (b) At least four hours of training on ASME Section XI requirements and plant specific procedures for the conduct of VT-2 visual examinations.
- (c) Vision test requirements in accordance with IWA-2321, 1995 Edition.

VI. Justification for Granting Relief:

In accordance with the provisions of 10 CFR 50.55a(a)(3)(i), the proposed alternative qualification requirements will provide an acceptable level of quality and safety. The proposed alternative qualification requirements are identical to those of ASME Section XI Code Case N-546. The NRC has not generically approved Code Case N-546 in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1." However, at least one other utility (Reference 4) has requested and received NRC approval to use Code Case N-546.

VI. Implementation Schedule:

FCS is in the Third Ten Year Inservice Inspection (ISI) Interval and intends to implement Code Case N-546 during this interval. Therefore, OPPD requests disposition of this relief request prior to July 1, 2001.