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U. S. Nuclear Regulatory Commission
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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED RELIEF REQUEST NO. RR-23 TO
REVISE THE QUALIFICATION AND
CERTIFICATION OF NDE PERSONNEL FOR
SECTION XI SUBARTICLE IWA-2300
PLA-5312**

**Docket Nos. 50-387
and 50-388**

Reference: Letter from USNRC to R. G. Byram titled "Relief Request No. 21 (RR-21) from American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Section XI, Susquehanna Steam Electric Station, Units 1 and 2 (TAC Nos. MB0462 and MB0464)," dated February 16, 2001.

The purpose of this letter is to request relief from the qualification and certification of nondestructive examination (NDE) personnel requirements of the ASME Code, Section XI, Subarticle IWA-2300 for NDE examinations required by IWA-2210, IWA-2220 and IWA-2230. The relief requested will allow NDE examination personnel the ability to utilize CP-189 as amended by Division I, instead of SNT-TC-1A for Section XI, Subarticle IWA-2300 examinations. The relief request is being submitted in accordance with 10CFR50.55a(a)(3)(i) in that the alternatives have been deemed to provide a commensurate level of quality and safety.

In 1999, 10CFR50.55a was amended (in 64FR51370) to require the use of the 1995 Edition, with the 1996 Addenda for Section XI, Subarticle IWA-2300. The 1995 Edition with the 1996 Addenda requires that CP-189 be used to determine the qualification and certification of NDE personnel. Prior to 1999, the 1989 Edition of the ASME Code was in effect for Section XI, Subarticle IWA-2300, which required that SNT-TC-1A be used for the qualification and certification of NDE personnel.

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The existing Susquehanna SES qualification and certification program utilizes SNT-TC-1A, which is in accordance with Code requirements. The approved Relief Request-21 (reference) allows SNT-TC-1A to be utilized for Ultrasonic examinations until August 31, 2001. Also, pursuant to Relief Request 21, the CP-189 program will be utilized after August 31, 2001, for Ultrasonic examinations.

Utilizing the CP-189 qualification and certification requirements for NDE personnel, for the additional Subsection IWA examinations, is considered equivalent to the qualifications and certifications required by SNT-TC-1A. Additionally, CP-189 is required to be used for the Third 10-Year Interval of the Inservice Inspection Program for the Susquehanna SES Units 1 and 2 beginning in June, 2004. Therefore, in lieu of maintaining redundant, possibly conflicting programs, the proposed alternative of maintaining a program which meets the requirements of CP-189, for the qualification and certification of NDE personnel, will simplify record keeping, satisfy the need to maintain personnel qualifications and certifications, eliminate redundant systems, and provide an acceptable level of quality and safety commensurate with other NDE disciplines.

In order to preclude the necessity to maintain two qualification and certification programs for NDE personnel, PPL Susquehanna, LLC requests that this relief request be approved by August 31, 2001. This relief request will remain in effect for the duration of the Second 10-Year Interval of the Inservice Inspection Program for Susquehanna SES Units 1 and 2 (June 1, 2004).

Please contact Mr. R. D. Kichline at 610 774-7705, if there are any questions concerning this submittal.

Sincerely,



R. G. Byram
Attachment

cc: Regional Administrator – Region I
Mr. S. L. Hansell, NRC Sr. Resident Inspector
Mr. R. G. Schaaf, NRC Sr. Project Manager

RELIEF REQUEST RR-23

**PPL Susquehanna, LLC
Susquehanna SES Units 1 and 2
Second 10-Year Interval**

RELIEF REQUEST RR-23

System/Component(s) For Which Relief Is Requested

All components subject to nondestructive examinations (NDE) in accordance with the 1989 Edition of ASME Section XI. This relief request will allow the use of CP-189 as amended by Division 1 (hereafter referred to CP-189), instead of ASNT SNT-TC-1A, 1984, as amended by Division 1 (hereafter referred to SNT-TC-1A) for the qualification and certification of NDE personnel.

Code Requirements

10 CFR 50.55a(b)(2) requires implementation of the ASME Code, Section XI, to the 1995 Edition, 1996 Addenda. Related Subarticle IWA-2300, of the 1995 Edition, 1996 Addenda of ASME Section XI requires qualification and certification of examiners to CP-189.

The 1989 Edition of ASME Section XI, Subarticle IWA-2300, identifies the qualification and certification requirements for NDE personnel as SNT-TC-1A.

Relief Requested

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested to base all requirements for initial qualification, certification and recertification of NDE examination personnel on Subarticle IWA-2300 of the 1995 Edition, 1996 Addenda of ASME Section XI. Subarticle IWA-2300 of the 1995 Edition, 1996 Addenda requires the use of CP-189. The relief requested is deemed to provide a commensurate level of quality and safety as the existing qualification and certification program, and with other NDE disciplines.

RELIEF REQUEST RR-23

Basis for Relief

The 1989 Edition of ASME Section XI, Subarticle IWA-2300, requires qualification and certification of NDE personnel using a written practice prepared in accordance with SNT-TC-1A. 10 CFR 50.55a was amended in the Federal Register in 1999 (64 FR 51370) to require the use of the 1995 Edition, with the 1996 Addenda for Section XI. This imposed the requirements of Subarticle IWA-2300 examinations, which requires a written practice prepared in accordance with CP-189.

The existing Susquehanna SES NDE qualification and certification program utilizes SNT-TC-1A. Relief Request 21 (approved February 16, 2001), requires that Susquehanna SES utilize CP-189, for Ultrasonic examinations, after August 31, 2001. Requiring CP-189 for Ultrasonic examinations, and SNT-TC-1A for other NDE examinations after August 31, 2001, will result in the necessity to maintain redundant, possibly conflicting programs with no increase in the acceptable level of quality and safety commensurate with other NDE disciplines.

Therefore, it is appropriate to base all NDE Section XI, Subarticle IWA-2300 qualification and certification requirements on CP-189 after August 31, 2001. Additionally, CP-189 is required to be implemented for all NDE personnel for the Third 10-Year Interval of the Inservice Inspection Program for the Susquehanna SES Units 1 and 2, beginning in June 2004.

Alternative Provision

Initial qualification and certification of NDE personnel shall be conducted in accordance with the requirements contained in Subarticle IWA-2300 of the 1989 Edition of Section XI utilizing the SNT-TC-1A qualification and certification program. Personnel performing Subarticle IWA-2300 NDE examinations shall meet the qualification and certification requirements for NDE personnel as required by the Code applicable to the Susquehanna SES.

Applicable Time Period

This relief request will remain in effect for the duration of the Second 10-Year Interval of the Inservice Inspection Program for Susquehanna SES Units 1 and 2 (June 1, 2004).