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Docket Nos. 50-321  
50-366

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

Edwin I. Hatch Nuclear Plant  
Third 10-Year Interval Inservice Testing Program,  
Request for Relief

Ladies and Gentlemen:

Edwin I. Hatch Nuclear Plant Units 1 and 2 are presently in their third ten-year inservice testing (IST) interval. The existing IST Program was developed to comply with the ASME OM Code 1990 Edition for IST of pumps and valves, and the 1995 Edition and 1996 Addenda for IST of safety and relief valves (see relief request RR-G-1 approved by NRC SE dated 4/12/96). These versions of the ASME OM Code specify duties of an Authorized Nuclear Inservice Inspector (ANII). However, later editions of both the ASME OM Code and ASME Section XI Code have eliminated IST as a duty of the ANII due to the minimal benefit added. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), SNC is submitting IST Program relief request RR-G-4 to eliminate the previous Code specified requirements for ANII involvement in IST at Plant Hatch.

Should you have any questions in this regard, please contact this office.

Respectfully submitted,

H. L. Sumner, Jr.

IFL/eb

Enclosure: IST Relief Request RR-G-4

cc: Southern Nuclear Operating Company  
Mr. P. H. Wells, Nuclear Plant General Manager  
SNC Document Management (R-Type A02.001)

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. L. N. Olshan, Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II  
Mr. L. A. Reyes, Regional Administrator  
Mr. J. T. Munday, Senior Resident Inspector - Hatch

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GENERAL RELIEF REQUEST  
RR-G-4

SYSTEMS: All in Scope of IST Program

VALVES: All in Scope of IST Program

PUMPS: All in Scope of IST Program

ASME CLASS: 1, 2 and 3

TEST REQUIREMENT:

ASME OM Code, 1990 Edition, subsection ISTA 2.1 and ASME OM Code, 1995 Edition with 1996 Addenda, subsection ISTA 2.1 provides the requirements for independent inspection (Authorized Nuclear Inservice Inspector - ANII) applicable for IST at Plant Hatch.

REQUIREMENT FOR WHICH RELIEF IS REQUESTED:

Relief is requested from the Code requirement to maintain independent inspection (ANII) oversight for the implementation of IST at Plant Hatch.

BASIS FOR RELIEF:

The requirements for independent inspection have been deleted in the ASME OM Code 1998 Edition. Additionally, the ASME Section XI Code deleted reference to independent inspection for IST on pumps and valves from subsection IWA-2110 in the 2000 Addenda.

The ANII review of the IST Program required by the ASME OM Code, 1990 and 1995 Edition, is less comprehensive than the review required by the ASME Section XI Code for Inservice Inspection (ISI) activities. The 1998 Edition, and subsequent editions, of the ASME OM Code have eliminated reference for ANII duties entirely. Section IWA-2110 of the ASME XI Code (2000 Addenda) specifies the duties of the ANII related to the IST performed for pumps and valves and component supports as simply verifying that inservice tests have been performed and the results recorded. In, general, ANIIs do not have the training or background experience to make determinations about pump and valve safety functions in order to verify program scope, or to assess the operational readiness of pumps and valves based on test results. Consequently, the ANII review provides little if any benefit.

SNC, at Plant Hatch, maintains a multi-layered review process that accomplishes the same results as expected by the earlier versions of the ASME XI and OM Codes. IST is typically performed by Operations, Maintenance, or Engineering Department personnel with extensive experience in Code requirements applicable for IST of pumps and valves. Test procedures contain detailed instructions for performance of tests and all data is reviewed by a minimum of two independent personnel (typically an Operations Shift Supervisor (SRO) and the IST Engineer). The IST Program scope is reviewed by regulatory authorities against Code and regulatory guidance to ensure that components required to be tested are included. The IST program documents, surveillance procedures, and test data are also subject to the SNC quality assurance program which provides an equivalent, or greater level of quality and safety than those required by ANII involvement specified in the Code. Therefore, there is no quality or safety related benefit in the ANII duplication of review and oversight of IST implementation at Plant Hatch.

Therefore, the proposed alternative, in conjunction with continued review and oversight by knowledgeable and experienced SNC personnel will provide an acceptable level of quality and safety and thus this request for relief is justified pursuant to 10 CFR 50.55a(a)(3)(i).

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ALTERNATE TESTING:

The ASME OM Code requirements specifying the duties of the ANII described in subsection ISTA 2.1 will be eliminated from the IST Program.