

August 1, 2006

Mr. Britt T. McKinney
Sr. Vice President
and Chief Nuclear Officer
PPL Susquehanna, LLC
769 Salem Blvd., NUCSB3
Berwick, PA 18603-0467

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 -
RECONCILIATION OF SECOND 10-YEAR INTERVAL INSERVICE
INSPECTION (ISI) PROGRAM PLAN (TAC NOS. MC7472, MC7473, MC7474,
MC7475, MC7476, MC7477, MC7478, MC7479, MC7480, MC7481)

Dear Mr. McKinney:

By letter dated May 31, 2005, PPL Susquehanna, LLC (PPL, the licensee) submitted 10 relief requests (RRs) for the second 10-year interval ISI Program Plan for Susquehanna Steam Electric Station, Units 1 and 2 (SSES 1 and 2). The proposed ISI Program Plan revises existing RR-04, RR-05, RR-06, and RR-09 to include additional components due to incomplete examinations, and adds new RR-32 due to incomplete examinations of supports. The Nuclear Regulatory Commission (NRC) staff has reviewed PPL's regulatory and technical analysis in support of its requests for relief for RR-04, RR-05, RR-06, RR-09, and RR-32.

The American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) of record for the SSES 1 and 2 second 10-year ISI program, which began on June 1, 1994, and ended on May 31, 2004, is the 1989 Edition of Section XI of the ASME Code, with no addenda. SSES 1 and 2 is currently in their third 10-year ISI interval which began on June 1, 2004, and will end on May 31, 2014.

Based on the information provided by PPL, the NRC staff has determined that granting relief pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.55a(g)(6)(i), for RR-04, RR-05, RR-09, and RR-32 is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon the licensee that could result if the requirements were imposed on the facility. Therefore, pursuant to 10 CFR 50.55a(g)(6)(i), the NRC staff grants the relief for RR-04, RR-05, RR-09, and RR-32 as described in PPL's letter dated May 31, 2005, for SSES 1 and 2 for the second 10-year interval ISI Program. For RR-06, the subject augmented examinations are not required by Section XI of the ASME Code; therefore, the NRC staff did not evaluate RR-06 as a code relief under 10 CFR 50.55a.

All other requirements of the ASME Code, Section XI, for which relief has not been specifically requested remain applicable, including third party review by the Authorized Nuclear Inservice Inspector.

B. McKinney

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If you have any questions, please contact the project manager, Rich Guzman, at (301) 415-1030.

Sincerely,

/RA/

Richard J. Laufer, Chief
Project Directorate I-1
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosure:
As stated

cc w/encl: See next page

B. McKinney

- 2 -

If you have any questions, please contact the project manager, Rich Guzman, at (301) 415-1030.

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Susquehanna Steam Electric Station, Unit Nos. 1 and 2

cc:

Robert A. Saccone
Vice President - Nuclear Operations
PPL Susquehanna, LLC
769 Salem Blvd., NUCSB3
Berwick, PA 18603-0467

Aloysius J. Wrape, III
General Manager - Performance
Improvement and Oversight
PPL Susquehanna, LLC
Two North Ninth Street, GENPL4
Allentown, PA 18101-1179

Terry L. Harpster
General Manager - Plant Support
PPL Susquehanna, LLC
769 Salem Blvd., NUCA4
Berwick, PA 18603-0467

Rocco R. Sgarro
Manager - Nuclear Regulatory Affairs
PPL Susquehanna, LLC
Two North Ninth Street, GENPL4
Allentown, PA 18101-1179

Walter E. Morrissey
Supervising Engineer
Nuclear Regulatory Affairs
PPL Susquehanna, LLC
769 Salem Blvd., NUCA4
Berwick, PA 18603-0467

Michael H. Crowthers
Supervising Engineer
Nuclear Regulatory Affairs
PPL Susquehanna, LLC
Two North Ninth Street, GENPL4
Allentown, PA 18101-1179

Steven M. Cook
Manager - Quality Assurance
PPL Susquehanna, LLC
769 Salem Blvd., NUCSB2
Berwick, PA 18603-0467

Luis A. Ramos
Community Relations Manager,
Susquehanna
PPL Susquehanna, LLC
634 Salem Blvd., SSO
Berwick, PA 18603-0467

Bryan A. Snapp, Esq
Assoc. General Counsel
PPL Services Corporation
Two North Ninth Street, GENTW3
Allentown, PA 18101-1179

Supervisor - Document Control Services
PPL Susquehanna, LLC
Two North Ninth Street, GENPL4
Allentown, PA 18101-1179

Richard W. Osborne
Allegheny Electric Cooperative, Inc.
212 Locust Street
P.O. Box 1266
Harrisburg, PA 17108-1266

Director, Bureau of Radiation Protection
Pennsylvania Department of
Environmental Protection
Rachel Carson State Office Building
P.O. Box 8469
Harrisburg, PA 17105-8469

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P.O. Box 35, NUCA4
Berwick, PA 18603-0035

Regional Administrator, Region 1
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Board of Supervisors
Salem Township
P.O. Box 405
Berwick, PA 18603-0035

Susquehanna Steam Electric Station, Unit Nos. 1 and 2

cc:

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
443 Orlando Avenue
State College, PA 16803

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO RELIEF REQUEST NOS. RR-04, RR-05, RR-06, RR-09, AND RR-32
FOR THE RECONCILIATION OF THE SECOND 10-YEAR INTERVAL INSERVICE
INSPECTION (ISI) PROGRAM PLAN OF THE AMERICAN SOCIETY OF MECHANICAL
ENGINEERS BOILER AND PRESSURE VESSEL CODE, SECTION XI
PPL SUSQUEHANNA, LLC
SUSQUEHANNA STEAM ELECTRIC STATION, UNITS AND 2
DOCKET NOS. 50-387 AND 50-388

1.0 INTRODUCTION

By letter dated May 31, 2005 (Agencywide Documents Access and Management System Accession No. ML051670219), PPL Susquehanna, LLC (PPL, the licensee) submitted its second 10-year interval ISI Program Plan for Susquehanna Steam Electric Station, Units 1 and 2 (SSES 1 and 2). The proposed ISI Program Plan revises existing relief requests (RR)-04, RR-05, RR-06, and RR-09 to include additional components due to incomplete examinations, and adds new RR-32 due to incomplete examinations of supports. The Nuclear Regulatory Commission (NRC) staff has reviewed PPL's regulatory and technical analysis in support of its requests for relief for RR-04, RR-05, RR-06, RR-09, and RR-32.

2.0 REGULATORY REQUIREMENTS

ISI of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code) Class 1, 2, and 3 components is performed in accordance with Section XI of the ASME Code and applicable addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Section 50.55a(g)(6)(i), except where specific relief has been granted by the NRC pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC if: (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) shall meet the requirements, except the design and access provisions and the pre-service 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

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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) twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The ASME Code of record for the SSES 1 and 2 second 10-year interval ISI Program, which began on June 1, 1994, and ended on May 31, 2004, is the 1989 Edition of Section XI of the ASME Code, with no addenda.

3.0 TECHNICAL EVALUATION

3.1 Relief Request No. RR-04

3.1.1 System/Component for which Relief is Requested

The reactor pressure vessel (RPV) pressure-retaining welds identified in Table 1 are for SSES 1 and 2 and are the subject of this relief request. For RR-04, PPL was granted relief for RPV welds AD, BK, BM, DG, DH, and AG for the second 10-year ISI interval in NRC safety evaluation (SE) dated July 11, 1996.

Table 1: RR-04

Component Identification	Description/ Item Number	Limiting Condition	Examination Coverage (%)*
AD	Shell circumferential weld/B1.11	Permanent RPV mirror insulation support steel precludes complete examination	85.6
BK	Shell longitudinal weld/B1.12	Permanent RPV mirror insulation support steel precludes complete examination	81.1
BM	Shell longitudinal weld/B1.12	Permanent RPV mirror insulation support steel precludes complete examination	81.1
DG	Bottom Head meridional weld/B1.22	Control Rod Drive housings limit access to all but 54 inches of this weld	23.7
DH	Bottom Head meridional weld/B1.22	Control Rod Drive housings limit access to all but 54 inches of this weld	23.7
AG	Closure head to flange weld/B1.40	Limited examination due to component (flange) geometry	80 (Vol)
DA	Bottom Head meridional weld/B1.22	Limited by RPV Skirt	89
DB	Bottom Head meridional weld/B1.22	Limited by RPV Skirt	89

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DC	Bottom Head meridional weld/B1.22	Limited by RPV Skirt	89
DD	Bottom Head meridional weld/B1.22	Limited by RPV Skirt	89
DE	Bottom Head meridional weld/B1.22	Limited by RPV Skirt	89
DF	Bottom Head meridional weld/B1.22	Limited by RPV Skirt	89
AF (240-360) Shell	Shell to flange weld/B1.30	Thermocouple interference	74

* Examination coverage based on actual examination coverage.

3.1.2 Code Requirements

ASME Code, Section XI, Table IWB-2500-1, examination category B-A, item numbers B1.11 and B1.12, require volumetric examination of essentially 100% of the weld length of all circumferential and longitudinal shell welds in accordance with the examination requirements illustrated in Figures IWB-2500-1 and 2, respectively. Relief is requested from complete examination of the affected weld numbers AD (Circumferential Reactor Pressure Vessel (RPV) Shell Weld), BK (Longitudinal RPV Shell Weld), and BM (Longitudinal RPV Shell Weld) due to a plant design obstruction caused by permanent RPV mirror insulation support steel.

ASME Code, Section XI, Table IWB-2500-1, examination category B-A, item number B1.22, requires volumetric examination of the accessible length of all meridional head welds in accordance with the examination requirements illustrated in Figure IWB-2500-3. Relief is requested from 100% examination of the affected bottom head meridional weld numbers DG (RPV Bottom Head Meridional Weld), DH (RPV Bottom Head Meridional Weld) due to plant design obstructions caused by the Control Rod Drive (CRD) housings.

ASME Code, Section XI, Table IWB-2500-1, examination category B-A, item number B1.40, requires volumetric and surface examination of essentially 100% of the weld length of the top head to flange weld number AG (RPV Closure Head to Flange Weld) in accordance with the examination requirements illustrated in Figure IWB-2500-5. Relief is requested from complete volumetric examination of weld AG due to component geometry. Surface examination of weld AG is not affected.

3.1.3 Licensee's Proposed Alternative

PPL did not propose an alternative to the ASME Code requirements; however, PPL performed the examinations of the affected welds to the maximum extent practical.

3.1.4 Licensee's Basis for Relief Request

Examinations of the affected welds [were] performed to the maximum extent practical.

For Item Numbers B1.11 and B1.12, the limited coverage represents a mere 0.56% of the total reactor vessel shell weld length. The affected welds (AD, BK, and BM) are located outside of the vessel beltline region. Plant design changes to effect greater examination coverage represent extreme hardship without a compensating return in increased plant safety.

For Item Number B1.22 meridional welds, the total examination coverage obtained is the maximum practical due to CRD obstructions. Examination coverage of the head-to-flange weld (Item Number B1.40) is also the maximum practical due to the component configuration.

The reactor pressure vessel pressure retaining welds are subject to VT-2 visual examination during system pressure testing in accordance with the requirements of Examination Category B-P.

3.1.5 NRC Staff's Evaluation

The ASME Code requires essentially 100% volumetric examination of the subject reactor pressure vessel welds contained in Table 1: RR-04. In Table 1: RR-04, PPL lists RPV Bottom Head Meridional Welds AD, BK, BM, DG, DH, and RPV closure head weld AG that were granted relief for the second 10-year ISI interval in the NRC SE dated July 11, 1996. The NRC staff has determined that, since the ASME Code-required examination coverage did not change, relief remains granted for welds AD, BK, BM, DG, DH, and AG. The RPV pressure retaining welds listed in Table 1: RR-04 are subject to VT-2 visual examination during system pressure testing in accordance with the requirements of Examination Category B-P.

PPL added Bottom Head Meridional Welds DA, DB, DC, DD, DE, DF, and shell-to-flange weld AF (240E-360E) to Table 1: RR-04. For the RPV Bottom Head Meridional Welds DA, DB, DC, DD, DE, and DF, the NRC staff has determined that the limited ASME Code-required examination coverage was caused by the RPV skirt obstructions which make the examinations impractical to perform. In order for PPL to perform the required ASME Code examination, the RPV and associated skirt would require design modifications. Thus, imposition of this requirement would result in a burden on the licensee. For welds DA, DB, DC, DD, DE, and DF, PPL obtained volumetric coverage of 89% for each weld. The NRC staff has determined that these examinations would have detected any significant patterns of degradation. The NRC staff has also determined that the volumetric and VT-2 visual examinations performed provide reasonable assurance of structural integrity of the subject welds.

For shell-to-flange weld AF (240E-360E), the NRC staff has determined that due to the obstruction of a thermocouple, it is impractical to perform the ASME Code-required examination. In order for PPL to perform the required ASME Code examination, the RPV and associated components would require design modifications. Thus, imposition of this requirement would result in a burden on the licensee. For weld AF, PPL obtained volumetric coverage of 74%. The NRC staff has determined that the examination would have detected any significant patterns of degradation. The NRC staff has also determined that the volumetric and VT-2 visual examinations performed provide reasonable assurance of structural integrity of the subject weld.

3.2 Relief Request No. RR-05

3.2.1 System/Component for which Relief is Requested

The SSES 1 and 2 Class 1 pressure retaining piping welds listed in Table 2 are the subject of this relief request.

Table 2: RR-05

Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)[*] (Vol)
VRRB311-FW-A5	Elbow-pump/ Reactor Recirculation/ Unit 1	RR pump insulation support framework obstructs complete access to the weld	83 (Sur) 83
DLA1011-FW-1	Pipe-Valve/ Feedwater/ Unit 1	Pipe whip restraint limits access to the weld	87 (Sur) 87
DBA2011-FW-50	Valve-Flued Head/ Reactor Water Clean-up/ Unit 2	Limited examination access due to component configuration	75
DCA2101-FW-2	Valve-Flued Head/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	75
DLA2031-FW-2	Valve-Flued Head/ Feedwater/ Unit 2	Limited examination access due to component configuration	75
N8A SE-Pen Seal	Safe End – Pen Seal/ RPV-E/ Unit 1	Limited examination access due to component configuration	81.25
N8B SE-Pen Seal	Safe End – Pen Seal/ RPV-E/ Unit 1	Limited examination access due to component configuration	81.25
DCA1031-FW-16	Pipe – Pipe/ Reactor Water Cleanup/ Unit 1	Support Interference	0
DCA1031-FW-57	Pipe – Pipe/ Reactor Water Cleanup/ Unit 1	Support Interference	36
DCA1072-FW-4	Valve – Elbow/ Core Spray/ Unit 1	Limited examination access due to component configuration	50

* Examination coverage based on actual examination coverage.

DCA1081-FW-10	Flued Head – Valve/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	75
DCA1091-FW-2	Valve – Flued Head/ Core Spray/ Unit 1	Limited examination access due to component configuration	50
Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)* (Vol)
DCA1101-FW-8	Elbow – Valve/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1101-FW-9	Valve – Pipe/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1101-FW-10	Pipe – Valve/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1101-FW-11	Valve – Tee/ Residual Heat Removal/ Unit 1	Interference with valve	0
DCA1102-FW-2	Valve – Flued Head/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1102-FW-8	Elbow – Valve/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1102-FW-9	Valve – Pipe/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1102-FW-10	Pipe – Valve/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1102-FW-11	Valve – Tee/ Residual Heat Removal/ Unit 1	Interference with valve	0
DCA1112-3-A	Pipe – Flange/ Residual Heat Removal/ Unit 1	Flange Interference	50
DCA1112-FW-5	Pipe – Valve/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	87.5
DCA1112-FW-14	Flange – Elbow/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	77.6

* Examination coverage based on actual examination coverage.

DCA1112-FW-18	Elbow – Flange/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	75
DCA1112-FW-13	Valve – Pipe/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	76.5
Component Identification	Description/ Item Number	Limiting Condition	Examination Coverage (%)* (Vol)
DCA1112-FW-16	Pipe – Flange/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	77.6
DCA1112-FW-17	Flange – Pipe/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	81
DCB1021-FW-1	Pipe – Valve/ Residual Heat Removal/ Unit 1	Limited examination access due to component configuration	47.25
DLA1031-FW-4	Valve – Pipe/ Feedwater/ Unit 1	Hanger Interference	0
VRRB311-1-A	Pipe – Sweepolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB311-2-B	Pipe – Weldolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB311-2-C	Pipe – Tee/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB311-3-1-H	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB311-3-2-B	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB311-14-B	Pipe – Weldolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	67
VRRB311-FW-A8	Valve – Elbow/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50

* Examination coverage based on actual examination coverage.

VRRB311-FW-A17M	Pipe – Safe End/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB311-FW-A19M	Pipe – Safe End/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB311-FW-A24	Valve – Weldolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	0
Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)* (Vol)
VRRB312-3-B	Pipe – Weldolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	38
VRRB312-3-F	Weldolet – Pipe/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB312-9-1-H	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	41.7
VRRB312-10-B	Pipe – Weldolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	73
VRRB312-10-C	Pipe – Tee/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB312-12-A	Pipe – Weldolet/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB312-FW-B16M	Pipe – Safe End/ Reactor Recirculation Unit 1	Limited examination access due to component configuration	50
VRRB312-FW-B19M	Pipe – Safe End/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB312-FW-B23	Elbow – Valve/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50
VRRB312-FW-B3	Elbow – Valve/ Reactor Recirculation/ Unit 1	Limited examination access due to component configuration	50

* Examination coverage based on actual examination coverage.

N8A SE-Pen Seal	Safe End – Pen Seal/ RPV-E/ Unit 2	Limited examination access due to component configuration	87.5
N8B SE-Pen Seal	Safe End – Pen Seal/ RPV-E/ Unit 2	Limited examination access due to component configuration	87.5
DBA2011-FW-45	Elbow – Elbow/ Reactor Water Cleanup/ Unit 2	Whip Restraint Interference	0
DCA2021-FW-1	Tee- Pipe/ Reactor Water Cleanup/ Unit 2	Limited examination access due to component configuration	80.11
Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)* (Vol)
DCA2022-1-B	Tee – Pipe/ Reactor Water Cleanup/ Unit 2	Limited examination access due to component configuration	87.5
DCA2031-FW-19	Pipe – Pipe/ Reactor Water Cleanup/ Unit 2	Hanger Interference	85
DCA2072-FW-4	Valve – Elbow/ Core Spray/ Unit 2	Limited examination access due to component configuration	50
DCA2081-FW-2	Pipe – Valve/ Residual Heat Removal/ Unit 2	Welded Clamp Interference	0
DCA2081-FW-9	Flued Head – Valve/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	77.7
DCA2092-FW-2	Valve – Flued Head/ Core Spray/ Unit 2	Limited examination access due to component configuration	50
DCA2101-FW-8	Elbow – Valve/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	78.1
DCA2101-FW-10	Pipe – Valve/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	76.4
DCA2102-FW-2	Valve – Flued Head/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	84.5
DCA2102-FW-7	Elbow – Valve/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50

* Examination coverage based on actual examination coverage.

DCA2101-FW-8	Valve – Pipe/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50
DCA2102-FW-9	Pipe – Valve/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50
DCA2111-FW-2	Valve – Pipe/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	87.5
DCA2113-2-A	Pipe – Flange/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50
Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)* (Vol)
DCA2113-FW-9	Pipe – Valve/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50
DCA2113-FW-10	Valve – Pipe/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50
DCA2113-FW-11	Pipe – Flange/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	87.5
DCA2113-FW-12	Flange – Elbow/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50
DCA2113-FW-13	Flange – Pipe/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	87.5
DCB2021-FW-2	Valve – Flued Head/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	50
DCB2021-FW-4	Flued Head – Elbow/ Residual Heat Removal/ Unit 2	Limited examination access due to component configuration	87.5
DLA2011-FW-6	Pipe – Valve/ Feedwater/ Unit 2	Whip Restraint Interference	83
DLA2031-FW-6	Pipe – valve/ Feedwater/ Unit 2	Whip Restraint Interference	87
DLA2041-FW-1	Valve – Pipe/ Feedwater/ Unit 2	Whip Restraint Interference	87

* Examination coverage based on actual examination coverage.

VNBB213-20-F	Pipe – Sweepolet/ Main Steam/ Unit 2	Hanger Interference	49.8
VNBB213-20-V	Pipe – Sweepolet/ Main Steam/ Unit 2	Hanger Interference	64.4
VNBB213-FW-C-4	Elbow – Valve/ Main Steam/ Unit 2	Support Lug Interference	81.9
VNBB213-FW-D-4	Elbow – Valve/ Main Steam/ Unit 2	Whip Restraint Interference	86
Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)* (Vol)
VNBB214-FW-A-4	Elbow – Valve/ Main Steam/ Unit 2	Whip Restraint Interference	85.4
VNBB214-FW-B-4	Elbow – Valve/ Main Steam/ Unit 2	Whip Restraint Interference	85. 4
VRRB313-2-B	Weldolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	24.8
VRRB313-3-1-G	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB313-3-2-B	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB313-3-2-C	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB313-3-F	Cross – Pipe Branch/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB313-14-F	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB313-FW-A-3	Elbow – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5

* Examination coverage based on actual examination coverage.

VRRB313-FW-A-4	Valve – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB313-FW-A-5	Elbow – Pump/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	66.3
VRRB313-FW-A-6	Pump – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB313-FW-A-7	Pipe – Valve/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	58.3
VRRB313-FW-A-8	Valve – Elbow/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	58.3
Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)* (Vol)
VRRB313-FW-A-11	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB313-FW-A-14	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB313-FW-A-19	Pipe – Safe End/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB313-FW-A-20	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB313-FW-A-23	Elbow – Valve/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB313-FW-A-24	Valve – Weldolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB313-FW-A-33	Tee – Valve/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	0
VRRB314-2-A	Tee – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB314-3-B	Pipe – Sweepolet/ Reactor Recirculation/ Unit 2	Hanger Interference	22

* Examination coverage based on actual examination coverage.

VRRB314-3-G	Pipe – Flange/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB314-9-1-G	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB314-9-1-H	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	75
VRRB314-9-2-B	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB314-9-2-C	Pipe Branch – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	75
Component Identification	Description/ System/ Unit	Limiting Condition	Examination Coverage (%)* (Vol)
VRRB314-10-B	Pipe – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	0
VRRB314-10-C	Pipe – Tee/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB314-12-A	Pipe – Sweepolet/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	0
VRRB314-FW-B-1	Safe End – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB314-FW-B-4	Valve – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB314-FW-B-5	Elbow – Pump/ Reactor Recirculation/ Unit 2	Insulation Lug Interference	69.75
VRRB314-FW-B-7	Pipe – Valve/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50

* Examination coverage based on actual examination coverage.

VRRB314-FW-B-10	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB314-FW-B-13	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB314-FW-B-14	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	50
VRRB314-FW-B-20	Sweepolet – Pipe/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB314-FW-B-23	Elbow – Valve/ Reactor Recirculation/ Unit 2	Limited examination access due to component configuration	87.5
VRRB314-FW-B-33	Valve – Tee Reactor/ Recirculation/ Unit 2	Limited examination access due to component configuration	0

3.2.2 Code Requirements

ASME Code, Section XI, Table IWB-2500-1, examination category B-J, item number B9.11 requires surface and volumetric examinations of essentially 100% of the weld surface and volume in accordance with the examination requirements as illustrated in Figure IWB-2500-8. Relief is requested from complete examination of the affected welds due to physical access restrictions and/or component configuration. Surface examination of the welds is not affected except for Weld VRRB311-FW-A5 and Weld DLA1011-FW-1.

3.2.3 Licensee's Proposed Alternative

PPL did not propose an alternative to the ASME Code requirements; however, PPL performed the examinations of the affected welds to the maximum extent practical.

3.2.4 Licensee's Basis for Relief

The Code requires selection of the affected welds for examination; that is, the stress levels at these particular weld locations exceed the limits specified in Note (1)(b)(1) [of Table IWB-2500-1, ASME Code, Section XI]. However, based on nondestructive examination data from the first inservice inspection interval, a complete examination of the Code required surfaces and/or volumes cannot be performed on these welds due to physical plant access restrictions and/or geometry of the adjoining components. Relief is requested from complete nondestructive examination of these components.

* Examination coverage based on actual examination coverage.

Given the Examination Category B-J selection criteria as applied to SSES 1 and 2, many other welds meeting the selection criteria can and will be examined. For most, the limitation affects only the volumetric examination and a complete surface examination can be performed.

All examinations were completed to the maximum extent practical. The affected welds are also subject to VT-2 visual examination during system pressure testing in accordance with the requirements of Examination Category B-P.

3.2.5 NRC Staff's Evaluation:

The ASME Code requires essentially 100% surface and volumetric examination of the subject welds contained in Table RR-5-1. ASME Code Case N-460, *Alternative Examination Coverage for Class 1 and Class 2 Welds*, as an alternative approved for use by the NRC in Regulatory Guide 1.147, Revision 14, *Inservice Inspection Code Case Acceptability*, states that a reduction in examination coverage due to part geometry or interference for any Class 1 and 2 weld is acceptable provided that the reduction is less than 10%, i.e., greater than 90% examination coverage is obtained.

PPL was granted relief for welds VRRB311-FW-A5, DLA1011-FW-1, DBA2011-FW-50, DCA2101-FW-2, and DLA2031-FW-2 in the NRC SE dated July 11, 1996. Subsequently, PPL submitted a request for relief for welds as listed in Table 2: RR-05 for the second 10-year interval that ended on May 31, 2004.

For welds DCA1031-FW-16, DCA1101-FW-11, DCA1102-FW-11, VRRB311-FW-A24, DCA2081-FW-2, VRRB313-FW-A-33, VRRB314-10-B, and VRRB314-FW-B-33 listed in Table 2: RR-05, PPL was unable to obtain any volumetric coverage on these welds due to component configuration, and interferences with supports and valves. Therefore, the requirements of the Code are impractical. In order to perform the required ASME Code volumetric examination, the components would require design modifications. Thus, imposition of the ASME Code-required volumetric examinations would result in a burden on the licensee.

Although PPL did not obtain any volumetric coverage, PPL did obtain 100% surface examination on each of the subject welds. In addition, PPL performs a VT-2 visual examination during system leakage tests on the subject welds. Furthermore, PPL examined a large number of similar welds in the same systems and at the same operating conditions and found no indications of degradation during the examinations of these welds. Therefore, the NRC staff concludes that the examinations performed on similar welds at the same operating conditions, the surface examination, and VT-2 visual examination would have detected any significant patterns of degradation and provide reasonable assurance of structural integrity of the subject welds.

For welds VRRB311-FW-A5, DLA1011-FW-1, DBA2011-FW-50, DCA2101-FW-2, and DLA2031-FW-2, the NRC staff has determined that complete ASME Code examination is impractical due to component configuration or physical obstructions that limit access to the examination areas. To perform the required ASME Code examination, the components would require design modifications. Thus, imposition of the ASME-Code required examinations would result in a burden on the licensee.

PPL obtained 100% surface examination on all but two welds, which had 83-87% of the surface areas examined. In most cases, a significant portion (>50%) of the required volumetric examinations was completed. In addition, these welds are part of a larger sample of welds that will receive complete surface and volumetric examinations. The volumetric coverage obtained by PPL represents a significant portion of the ASME Code-required volume. PPL also performs a VT-2 visual examination during system leakage tests on the subject welds. Adequate assurance of the structural integrity of the subject welds will be provided by the partial examination of the welds and the complete examination of other similar welds. The NRC staff has determined that these examinations would have detected any significant patterns of degradation. The NRC staff has also determined that the examinations performed provide reasonable assurance of structural integrity of the subject welds. Therefore, the NRC staff has determined that for welds VRRB311-FW-A5, DLA1011-FW-1, DBA2011-FW-50, DCA2101-FW-2, and DLA2031-FW-2, the relief granted in the July 11, 1996, NRC SE, remains valid for the second 10-year ISI interval.

3.3 Relief Request No. RR-06

3.3.1 System/Component for which Relief is Requested

The SSES 1 and 2 components listed in Table 3, subject to the examination requirements of the Augmented Inservice Inspection Program, are discussed in this relief request. Included in the scope of this relief request are only those limited components subject to augmented ISI requirements mandated by regulatory and enforcement authorities.

Note: The licensee's augmented examinations for the SSES 1 and 2 second 10-year ISI interval are not required by Section XI of the ASME Code or 10 CFR 50.55a. The requirements for examination originate from regulatory direction found in NUREG-0313, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," NUREG-0619, "BWR Feedwater Nozzle and Control Rod Drive Return Line Nozzle Cracking," and Generic Letter (GL) 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping." Each augmented program varies with regard to the type of examination and the extent and frequency of examination.

Table 3: RR-06

Component Identification	Description/ Item Number	Examination Req's	Limiting Condition	Exam Coverage (%)
DBA1012-FW-6	Pipe-Flued Head/ Reactor Wtr. Clean- up/ Unit 1	FSAR Section 6.6.8	Hanger removal required to facilitate exam; Area survey indicates 18R field; Estimate 801 mhrs in area to complete examination	0 (Vol)
DBB1181-1-A	Pipe-Sweepolet/ Feedwater/ Unit 1	FSAR Section 6.6.8	Access restricted due to welded support	79 (Vol)
DBA2011-FW-50	Pipe-Flued Head/ Reactor Wtr. Clean- up/ Unit 1	FSAR Section 6.6.8	Access restricted due to weld geometry	75 (Vol)
DLA2031-FW-2	Valve-flued Head/ Feedwater/ Unit 2	FSAR Section 6.6.8	Access restricted due to weld geometry	75 (Vol)
DBA2011-FW-23	Elbow-Valve/ Reactor Wtr. Clean- up/ Unit 2	FSAR Section 6.6.8	Examination limited by welded support bracket	35 (Vol)
N4B-IR	Nozzle inner radius/ Feedwater/ Unit 1	NUREG-0619	Biological shield wall restricts access to examination equipment	84.7 (Vol)
N4B-Bore	Nozzle bore/ Feedwater/ Unit 1	NUREG-0619	Biological shield wall restricts access to examination equipment	84.9 (Vol)
N4D-IR	Nozzle inner radius/ Feedwater/ Unit 2	NUREG-0619	Access restricted due to thermocouple pads	83.6 (Vol)
N4D-Bore	Nozzle bore/ Feedwater/ Unit 2	NUREG-0619	Access restricted due to thermocouple pads	84.4 (Vol)
DBB1071-1-B	Elbow-Pipe/ Residual Heat Removal/ Unit 1	NUREG-0313 Category C	Permanent pipe support saddle restricts complete scan	84 (Vol)
DCB1021-FW-2	Valve-Flued Head/ Residual Heat Removal/ Unit 1	NUREG-0313 Category C	Limited access due to component configuration	50 (Vol)
DCB1021-FW-4	Flued Head-Elbow/ Residual Heat Removal/ Unit 1	NUREG-0313 Category C	Welded pipe clamp restricts access to weld	89.4 (Vol)

Component Identification	Description/ Item Number	Examination Req's	Limiting Condition	Exam Coverage (%)
DBB2071-FW-3	Pipe-Valve/ Residual Heat Removal/ Unit 2	NUREG-0313 Category C	Limited access due to adjacent pipe support, vent line and component configuration	82.5 (Vol)
DCA2101-FW-2	Valve-Flued Head/ Residual Heat Removal/ Unit 2	NUREG-0313 Category B	Limited examination access due to component configuration	75 (Vol)
DCA1081-FW-12	Valve-Elbow/ Residual Heat Removal/ Unit 1	NUREG-0313 Category C	Limited examination access due to component configuration	50 (Vol)
DCA1101-FW-2	Valve-Flued Head/ Residual Heat Removal/ Unit 1	NUREG-0313 Category B	Valve Interference	0 (Vol)
EBD1143-FW-23	Pipe-Elbow/ Main Steam Unit 1	FSAR Section 6.6.8	Limited examination access due to component configuration	69 (Vol)
N1A NOZ-SE	Nozzle-Safe End/ RPV External Unit 2	NUREG-0313 Category C	Limited examination access due to component configuration	75 (Vol)
N1B NOZ-SE	Nozzle-Safe End/ RPV External Unit 2	NUREG-0313 Category C	Limited examination access due to component configuration	75 (Vol)
DBB2041-FW-16	Pipe-Pipe/ Main Steam/ Unit 2	FSAR Section 6.6.8	Irremovable Scale	0 (Vol)
DBB2041-FW-19	Reducer-Pipe/ Main Steam/ Unit 2	FSAR Section 6.6.8	Irremovable Scale	0 (Vol)
DBB2072-FW-3	Pipe-Valve/ Residual Heat Removal/ Unit 2	NUREG-0313 Category C	Limited examination access due to component configuration	82 (Vol)
DBB2181-1-A	Weldolet-Pipe/ Feedwater/ Unit 2	FSAR Section 6.6.8	Limited examination access due to component configuration	50 (Vol)
DBC2011-FW-42	Elbow-Flange/ Reactor Wtr. Clean- up/ Unit 2	FSAR Section 6.6.8	Water in pipe for radiographic examination	78.6 (Vol)

Component Identification	Description/ Item Number	Examination Req's	Limiting Condition	Exam Coverage (%)
DCA2081-FW-11	Valve-Elbow/ Residual Heat Removal/ Unit 2	NUREG-0313 Category C	Limited examination access due to component configuration	50 (Vol)
EBD2141-2A-A	Pipe-Elbow/ Main Steam/ Unit 2	FSAR Section 6.6.8	Welded hanger interference	79 (Vol)
VNBB214-FW-A-4	Elbow-Valve/ Main Steam/ Unit 2	FSAR Section 6.6.8	Whip restraint interference	85.4 (Vol)
Note: Examination coverage based on actual examination coverage.				

3.3.2 Licensee's Basis for Relief

Complete examination in accordance with the governing augmented examination requirements is not practical due to the limitations noted in the above Table 3 of RR-06. All examinations were completed to the maximum extent practical.

3.3.3 NRC Staff's Evaluation:

The subject augmented examinations in RR-06 are not required by Section XI of the ASME Code or 10 CFR 50.55a, but pertain to a regulatory commitment made by PPL in letter dated April 16, 1993 (PLA-3961). Therefore, the NRC staff did not evaluate RR-06 as a code relief under 10 CFR 50.55a. The information provided by PPL indicates that complete examination coverage cannot be achieved due to obstructions/physical limitations that restrict access to the examination areas as indicated in Table 3 of RR-06 and provides information on the coverages obtained.

The NRC staff expects that PPL will evaluate any changes to the augmented examinations of the subject welds consistent with PPL's commitment management program, the SSES 1 and 2 plant-controlled ISI Program, and the requirements of 10 CFR 50.59.

3.4 Relief Request No. RR-09

3.4.1 System/Component for which Relief is Requested

SSES 1 and 2 pressure retaining austenitic stainless steel (or dissimilar metal) welds listed in Table 4 are the subject of this relief request.

Table 4: RR-09

Component Identification	Configuration /System/Unit	Code Item No	Limiting Condition	Exam Coverage (%)
DBB1071-1-B	Elbow-Pipe/ Residual Heat Removal/ Unit 1	C5.11	Permanent pipe support saddle restricts complete scan	84 (Vol)
DBB2071-FW-3	Pipe-Valve/ Residual Heat Removal/ Unit 2	C5.11	Limited access due to adjacent pipe support, vent line, and component configuration	82.5 (Vol)
DCA1101-FW-1	Pipe-Valve/ Residual Heat Removal/ Unit 1	C5.11	Limited access due to hanger interference and configuration	50 (Vol)
DCA1102-FW-1	Pipe-Valve/ Residual Heat Removal/ Unit 1	C5.11	Limited examination access due to component configuration	50 (Vol)
DCB1021-FW-1	Pipe-Valve/ Residual Heat Removal/ Unit 1	C5.11	Limited examination access due to component configuration	50 (Vol)
DCA2091-FW-1	Pipe-Valve/ Core Spray/ Unit 2	C5.11	Limited examination access due to component configuration	50 (Vol)
DCA2092-FW-1	Pipe-Valve/ Core Spray/ Unit 2	C5.11	Limited examination access due to component configuration	50 (Vol)
GBB2171-FW-14	Elbow-Valve/ Residual Heat Removal/ Unit 2	C5.11	Limited examination access due to component configuration	50 (Vol)
Note: Examination coverage based on actual examination coverage.				

3.4.2 Code Requirements

Table IWC-2500-1, examination category C-F-1, item number C5.11, requires volumetric and surface examination of all circumferential welds in accordance with the examination requirements illustrated in Figure IWC-2500-7. Relief is requested from complete nondestructive examination of the subject welds due to physical restrictions and/or component geometry.

3.4.3 Licensee's Proposed Alternative

PPL did not propose an alternative to the ASME Code requirements; however, PPL performed the examinations of the affected welds to the maximum extent practical.

3.4.4 Licensee's Basis for Relief

The Code requires selection of the affected welds for examination. Based on nondestructive examination data from the first inservice inspection interval, complete volumetric examination of the Code required volumes cannot be performed due to physical plant access restrictions and/or geometry of the adjoining components. Relief is requested from complete nondestructive examination of these components.

Examination coverage is greater than 80% for the affected welds and the limitations affect only the volumetric examination; a complete surface examination can be performed. Also, since the affected welds are included for examination in the Augmented inservice inspection Program, the welds will be examined more frequently throughout the second inservice inspection interval.

All examinations will be completed to the maximum extent practical. The affected welds are also subject to VT-2 visual examination during system pressure testing in accordance with the requirements of Examination Category C-H.

3.4.5 NRC staff's Evaluation

The Code requires essentially 100% surface and volumetric examination of the subject welds contained in Table 4: RR-09. However, the configuration of the welds restricts access and precludes 100% volumetric examination. Therefore, the Code requirement is impractical for the subject welds. To perform the examinations to the extent required by the Code, the welds would require design modifications to allow sufficient access. Imposition of the requirement would result in a burden on PPL.

PPL stated that a significant portion of the weld volume has been examined. PPL has performed the examination to the extent possible.

The NRC staff has determined that these examinations, and the complete examination of similar welds, would have detected any significant patterns of degradation and that the examinations performed on the subject supports provide reasonable assurance of structural integrity of the supports.

3.5 Relief Request No. RR-32

3.5.1 System/Component for which Relief is Requested

SSES 1 and 2, ASME Code, Section XI, Examination Category F-A supports listed in Table 5 are the subject of this relief request.

Table 5: RR-32*

Component Identification	Description/ System/ Unit	Category / Item No.	Limiting Condition	Exam Coverage (%)(1)
GBB1012-H26	Rigid Support/Guide/ Core Spray/ Unit 1	F-A/ F1.20	Thermo-Lag Interference	80
ST BRKT SUP-A	Stabilizer Bracket Support/ RPV-External/ Unit 2	F-A/ F1.40	Insulation Bracket Interference	60
ST BRKT SUP-B	Stabilizer Bracket Support/ RPV-External/ Unit 2	F-A/ F1.40	Insulation Bracket Interference	60

* Table 5: RR-32 is part of the licensee's submittal dated May 31, 2005, and has been recreated in this safety evaluation.

** Examination coverage based on actual examination coverage.

3.5.2 Code Requirements

ASME Code, Section XI, Table IWF-2500-1, examination category F-A, item numbers F1.20 and 1.40, requires a visual VT-3 examination of select component supports. Relief is requested from complete non-destructive visual examination of certain component supports which meet the selection criteria for which a complete visual examination cannot be performed due to physical interferences.

3.5.3 Licensee's Proposed Alternative

PPL did not propose an alternative to the ASME Code requirements; however, PPL performed the examinations of the affected welds to the maximum extent practical.

3.5.4 Licensee's Basis for Relief

Complete visual examination in accordance with the governing examination requirements is not practical due to the limitations noted in Table 5: RR-32. All examinations will be completed to the maximum extent practical.

3.5.5 NRC Staff's Evaluation

The ASME Code requires VT-3 visual examination of the subject ASME Code, Section XI, Examination Category F-A supports listed in Table 5: RR-32. Based on drawings¹ provided by PPL for supports GBB1012-H26 and ST BRKT SUP-A and B, the NRC staff has determined that complete ASME Code examinations are impractical due to obstructions by the thermo-lag insulation and brackets that restrict access to the examination areas. Imposition of the ASME Code-required examinations would result in a burden on the licensee because these components would have to be redesigned in order to perform the ASME Code-required visual examination.

For support GBB1012-H26, PPL obtained 80% visual coverage, and for supports ST BRKT SUP-A and B, PPL obtained 60% visual coverage. The NRC staff has determined that the examination coverage obtained by PPL for the subject supports represents a significant portion of the ASME Code-required visual examination. The NRC staff has further determined that these examinations would have detected any significant patterns of degradation, if any had occurred. Thus, the NRC staff has determined that the examinations performed on the subject supports provide reasonable assurance of structural integrity of the supports.

4.0 CONCLUSION

For Request Relief No. RR-04 welds DA, DB, DC, DD, DE, DF, and AF, the NRC staff has concluded that the ASME Code-required examinations are impractical to perform due to physical obstructions. Imposition of this requirement would result in a burden on PPL. The VT-2 visual and volumetric examinations performed to the extent practical provide reasonable assurance of the structural integrity of the subject RPV welds. Therefore, for welds DA, DB, DC, DD, DE, DF, and AF, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year ISI program interval. The NRC staff further concludes that the relief in NRC SE dated July 11, 1996, remains granted for welds AD, BK, BM, DG, DH, and AG pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year interval ISI Program.

For Request Relief No. RR-05, the NRC staff has concluded that the ASME Code-required examinations are impractical due to physical obstructions. Imposition of this requirement would result in a burden on PPL. The examinations performed to the extent practical provide reasonable assurance of the structural integrity of the subject welds. Therefore, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year ISI program. The NRC staff has further concluded that the relief in the NRC SE dated July 11, 1996, remains granted for welds VRRB311-FW-A5, DLA1011-FW-1, DBA2011-FW-50, DCA2101-FW-2, and DLA2031-FW-2 pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year interval ISI Program.

The NRC staff did not evaluate RR-06 under 10 CFR 50.55a(g)(6)(i), as the subject augmented examinations are not required by Section XI of the ASME Code or 10 CFR 50.55a.

For Request Relief No. RR-09, the NRC staff has concluded that the ASME Code-required examinations are impractical due to physical restrictions. Imposition of this requirement would result in a burden on PPL. The examinations performed by PPL to the extent practical provide

1 Drawings of the subject supports are not included in this report.

reasonable assurance of the structural integrity of the subject welds. Therefore, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year interval ISI Program.

For Request Relief No. RR-32, the NRC staff has concluded that the ASME Code-required VT-3 visual examinations of supports GBB1012-H26 and ST BRKT SUP-A and B are impractical due to physical restrictions. Imposition of this requirement would result in a burden on PPL. Furthermore, the NRC staff concludes that the visual examinations performed by PPL to the extent practical provide reasonable assurance of the structural integrity of the subject supports. Therefore, for supports GBB1012-H26 and ST BRKT SUP-A and B, relief is granted pursuant to 10 CFR 50.55a(g)(6)(i) for the second 10-year interval ISI Program.

The NRC staff has determined that the granting relief pursuant to 10 CFR 50.55a(g)(6)(i) is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest giving due consideration to the burden upon PPL that could result if the requirements were imposed on the facility. All other requirements of the ASME Code, Section XI, for which relief has not been specifically requested remain applicable, including third party review by the Authorized Nuclear Inservice Inspector.

Principal Contributors: T. McLellan
Z. Fu

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