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SUBJECT: Responds to 920616 ltr re inservice insp program for plant. No corrective action considered necessary for item.

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August 17, 1992

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Inservice Inspection Program for R. E. Ginna Nuclear Power Plant, Docket No. 50-244

Reference:

(a) Letter from A. R. Johnson, NRC, to R. C. Mecredy, RG&E, Subject: Rochester Gas & Electric Corporation's April 24, 1991, and May 6, 1991, Letters Regarding Revisions of the Ginna Nuclear Power Station Quality Assurance Manual, Appendix B, Inservice Inspection Program for the 1990-1999 Interval (TAC NO. M74099), dated June 16, 1992.

(b) Letter from L. D. White, RG&E, to A. Schwencer, NRC, Subject: List of ASME Code Requirements for Which Relief is Granted, dated June 9, 1977.

(c) NRC Inspection Report No. 244/84-05, March 19-23 and March 27-30, 1984.

(d) Letter from L. D. White, RG&E, to D. L. Ziemann, NRC, Subject: Inservice Inspection Program for the 1980 - 1989 Interval, dated July 2, 1979.

Dear Mr. Johnson :

This letter is written in response to your letter of June 16, Reference (a), in which you discuss three issues involving the Third Interval Inservice Inspection (ISI) Program (1990 - 1999) and request information on the Second Interval ISI Program (1980 - 1989).

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RG&E has reviewed your comments on the Third Interval ISI Program and provides the following:

1. **The Code requirement dealing with the use of the NIS-I and NIS-2 forms to be used as part of the ISI summary reports.**

   RG&E agrees with the concerns raised in your letter and began using the NIS-1 and NIS-2 forms as part of the 1992 Outage Summary report. We note that NRC Inspection Report 50-244/91-20, dated October 1, 1991, reviewed this specific issue and no concerns were raised at that time regarding the alternate reporting system being used at Ginna.

2. **Removal of insulation, during hydrostatic tests, from bolted connections with ferrous steel fasteners used in piping systems for controlling boration.**

   After further review, RG&E agrees that the basis for excluding the removal of insulation during hydrostatic tests as described in 1.10.3.2 of Appendix B of the Ginna Quality Assurance Manual was incorrect. This paragraph will be revised to remove this exclusion. It is anticipated that this revision will be completed and submitted to the NRC by the end of 1992 which is prior to the next scheduled outage involving hydrostatic testing. RG&E has also performed a review of the hydrostatic tests performed to date during the Third Interval. This review determined that all insulation was removed and as such, all tests have been conducted in compliance with the Code.

3. **Modification to paragraph 1.8.2.1, with respect to the use of the NDE method that first detected the flaw in accordance with ASME, Boiler & Pressure Vessel Code, Section XI, IWA-4500(a).**

   Paragraph 1.8.2.1 of Appendix B to the Ginna Quality Assurance Manual deals only with the Construction Code NDE. It also imposes additional requirements that RG&E has determined to be necessary. The next two steps of the Program provide for the flaw detection and Preservice Inspection NDE as questioned in your letter. These steps are as follows:

   1.8.2.2 *The examination shall include the method that detected the flaw, if applicable.*

   1.8.2.3 *Applicable examination requirements of ASME Section XI, 1986 Edition shall also be met to serve as a new PSI baseline for future ISI examinations, unless the examination performed under paragraph 1.8.2.1 was conducted under conditions and with equipment and techniques equivalent to those required by Section XI.*

   Therefore, no corrective action is considered necessary for this item.

The above discussion addresses the issues raised by the NRC with respect to the Third Interval ISI Program.

Prior to discussing NRC comments relative to the Second Interval ISI Program, background regarding Relief Request XII of that program is provided. Relief Request XII dealt with use of the Authorized Nuclear Inservice Inspector (ANII). This relief request was submitted and approved by the NRC with respect to the First Interval Program (1975-1980). It was also used for the Second Interval Program which was submitted to the NRC for review. It is RG&E's understanding that this request was accepted by the NRC and therefore allowed the duties of the ANII to be performed within our Quality Assurance Program, with technical reviews and oversights performed by our Plant Operation Review Committee (PORC). This was explained in Reference (b).

In 1984, the NRC performed an inspection with the focus on the Second Interval Program at Ginna (Reference (c)). Two of the documents reviewed by the NRC team include the following:

a. QA Manual, Appendix B, Revision 7, "Inservice Inspection Program for the 1980-1989 Interval"

b. Attachment A to Appendix B, "Exemptions" (note: exemptions are synonymous with relief requests)

These documents clearly describe how the ISI Program was being implemented at Ginna. RG&E was not informed at that time of any NRC concerns relative to the inspection process. There have also been several other reviews and audits of the ISI Program performed by the NRC with no concerns raised about the role of the ANII. During the Second Interval, an ANII from Hartford Steam Boiler Inspection and Insurance Company was supplied to RG&E from American Nuclear Insurers as part of our insurance inspections. The ANII reviewed the NDE portion of the ISI Program and the Pump and Valve segment when it was incorporated into the Program. These duties are consistent with those stated in the last paragraph of Exemption XII:

> *The functions of the authorized nuclear inservice inspector, namely their review and verification of inservice examinations, personnel qualifications, and equipment certification during the annual outages at Ginna Nuclear Power Station will be performed by personnel of the Hartford Steam Boiler Inspection Company. The qualifications of the inspectors, inspections specialists, and inspection agency are in compliance with the Code.*

Since the ANII was not required to perform inspections for repairs, replacements and modifications per Relief Request XII, he did not perform these functions. Also, since the administrative functions of the ANII were being performed under the Quality Assurance Program, the NIS-1 Form was not used.

With respect to your questions concerning the Second Interval:

a. Repairs, modifications, and replacements under Section XI.

The ISI Code Program in effect during the Second Interval was originally provided to the NRC by Reference (d). This submittal included relief requests from Section XI as necessary. All repairs, replacements and modifications met the requirements of this Code Program during the Second Interval.

b. Duties accomplished by the ANII.

The duties of the ANII were not required during the Second Interval Program per Relief Request XII, but an ANII was provided under an agreement with American Nuclear Insurers, as stated above, who performed reviews on the NDE and Pump and Valve portions of the Program. RG&E believes that not using an ANII for inspections per the exemption had no significant impact based on the review and oversight functions provided by the Quality Assurance Program and the PORC. The Quality Assurance Program utilizes independent QA/QC organizations that contain sufficiently trained personnel to provide an equivalent, qualified third party review. The PORC also maintains an additional oversight function over all safety-related activities including the ISI program.

RG&E believes that relief was requested during the Second Interval for all actions for which relief was necessary. The only potential action which may not have been explicitly addressed is with respect to the use of the NIS-1 forms. Since the administrative functions of Section XI were performed by the Ginna Quality Assurance Program, it was assumed that the NIS-1 form, mandatory under Appendix II of Section XI, was not needed.

Based on the above, RG&E believes that we operated under an NRC approved program and that all Code requirements were satisfied with the ISI Program in effect during the Second Interval. For the Third Interval Program, RG&E has contracted with the Hartford Steam Boiler Inspection and Insurance Company to supply the services of an ANII. Currently, for the Third Interval, an ANII is performing all required Code duties in accordance with IWA-2110. Consequently, RG&E is also reviewing the need to withdraw Relief Request III for the 1990 Inservice Inspection Program with respect to not using an "Authorized Inspection Agency" for the ISI program. This assessment will be completed in conjunction with the update of Appendix B of the Ginna Quality Assurance Manual as discussed above.

Very truly yours

Robert C. Mecredy

Robert C. Mecredy