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 FACIL:50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G      05000244  
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 MECREDY,R.C.      Rochester Gas & Electric Corp.  
 RECIP.NAME      RECIPIENT AFFILIATION  
 VISSING,G.S.

SUBJECT: Requests approval for use of relief request 35 re use of  
 AMSE Section XI Code,1995 Edition,1996 Addenda,to develop  
 licensee fourth 10-yr interval ISI program on class 1,2 & 3  
 components.

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Vice President  
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August 6, 1998

U.S. Nuclear Regulatory Commission  
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Washington, D.C. 20555

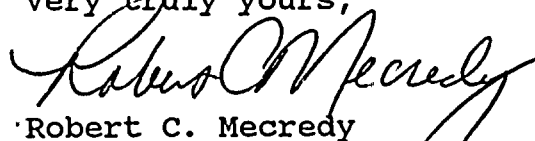
Subject: Inservice Inspection Program ASME Section XI  
Required Examinations  
Fourth 10-Year Interval  
Request for Relief Regarding Request No. 35  
R.E. Ginna Nuclear Power Plant  
Docket No. 50/244

Dear Mr. Vissing:

The purpose of this letter is to seek approval for the use of Relief Request number 35 concerning the use of ASME Section XI Code, 1995 Edition, 1996 Addenda, which has not been endorsed within 10 CFR 50.55a. This code will be used to develop our Fourth 10-Year Interval ISI Program on Class 1, 2 and 3 components, with the exception of Containment requirements of IWE and IWL.

This Relief is requested pursuant to the provisions of 10 CFR 50.55a(a)(3)(i), the use of a later ASME Section XI Code. Justification is included in the attachment to this letter. It is requested that this relief request be expedited and NRC reply obtained before September 1998 in order for it to be utilized at R.E. Ginna Nuclear Power Plant for preparation of the submittal of our Fourth Interval Program. As required by 10 CFR 50.55a, our Fourth Interval Program needs to be submitted to the NRC six (6) months prior to the end of our Third Interval, which ends December 31, 1999.

Very truly yours,

  
Robert C. Mecredy

JSM/mab:504  
Attachment

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xc: Mr. Guy S. Vissing (Mail Stop 14B2)  
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U.S. NRC Ginna Senior Resident Inspector

ATTACHMENT

Rochester Gas and Electric Corporation  
Ginna Station  
Docket No. 50/244  
Fourth 10-Year Interval  
Request for Relief No. 35  
ASME Code Section XI Alternative for the Fourth Interval ISI  
Program

I. System/Component(s) for Which Relief is Requested:

This Relief Request is requested for Inservice Inspection of all ASME Class 1, Class 2 and Class 3 components in accordance with the rules provided in ASME Section XI Code, Division 1.

II. Code Requirement:

10 CFR 50.55a specifies the ASME Section XI Code, 1989 Edition, that has been endorsed for owners to utilize in the preparation and use for their ASME Section XI Inservice Inspection Program as well as their Repair and Replacement Program. Later ASME Section XI Codes may be utilized only if approved by the NRC.

III. Code Requirement from Which Relief is Requested:

R.E. Ginna Nuclear Power Plant is requesting relief from utilizing the ASME Section XI Code, 1989 Edition, and is requesting permission for the use of ASME Section XI Code, 1995 Edition with the 1996 Addenda for Class 1, 2, and 3 components for our Fourth Interval ISI Program instead of the 1989 Edition Code Edition as identified within the current 10 CFR 50.55a.

This Relief Request does not address Containment (IWE/IWL and applicable IWA) requirements. The Containment requirements shall be performed to ASME Section XI Code, 1992 Edition with the 1992 Addenda. This year and edition of ASME Section XI Code is the basis for the EPRI/Industry Guideline which will be used to develop and implement our Containment Inspection Program.

#### IV. Basis for Relief:

Relief is requested pursuant to the provisions of 10 CFR 50.55a(a)(3)(i), request for approval to use a later ASME Section XI Code. The proposed alternative will provide an acceptable level of quality and safety.

On December 3, 1997, the NRC issued a proposed change in the Federal Register to amend 10 CFR 50.55a for Inservice Inspection. The proposed rulemaking endorsed the use of ASME Section XI Code, 1995 Edition with the 1996 Addenda for the Inservice Inspection as well as for Repair or Replacement of Class 1, 2, and 3 components. The use of this later code is clearer and provides much needed clarification to those requirements specified within the current approved Code (1989 Section XI Code). By utilizing the later Section XI Code for Inservice Inspection as well as Repair and Replacement of Class 1, 2, and 3 components, would minimize the number of needed relief requests that the NRC would be required to process.

It is requested that ASME Section XI Code, 1995 Edition with the 1996 Addenda be utilized to develop R. E. Ginna Nuclear Power Plant Fourth Interval Program.

#### V. Alternate Examinations:

R.E. Ginna Nuclear Power Plant requests that our Fourth Interval Inservice Inspection (ISI) Program as well as our Repair and Replacement Program shall conform to ASME Section XI Code, 1995 Edition with the 1996 Addenda for Class 1, 2 and 3 Components including supports. The Fourth Interval Section XI Inservice Testing (IST) Program for R.E. Ginna Nuclear Power Plant shall conform to 10 CFR 50.55(a) which implements ASME Section XI Code, 1989 Edition.

#### VI. Justification for the Granting of Relief:

On December 3, 1997, the NRC issued a proposed change in the Federal Register to amend 10 CFR 50.55a for Inservice Inspection. The proposed rulemaking endorsed the use of ASME Section XI Code, 1995 Edition with the 1996 Addenda for the Inservice Inspection as well as for Repair or Replacement of Class 1, 2, and 3 components.

The use of the 1995 code is clearer and provides much needed clarification to those requirements specified within the current approved Code (1989 Section XI Code). NRC approval to utilize the later Section XI Code for Inservice Inspection, as well as Repair and Replacement of Class 1, 2, and 3 components, would minimize the number of needed relief requests that the NRC would be required to process.

VII. Implementation Schedule:

Examinations will be performed during the Fourth 10-year Interval.