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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 34 re ASME Section XI Category C-C,to address surface exam limitations associated w/integral attachments of identified Class 2 component supports.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

August 6, 1998

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Guy S. Vissing
Project Directorate I-1
Washington, D.C. 20555

Subject: Inservice Inspection Program ASME Section XI Required Examinations
Third 10-Year Interval
Request for Relief Regarding Request No. 34
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 34 concerning ASME Section XI Category C-C, to address surface examination limitations associated with integral attachments of identified Class 2 component supports.

This Relief is requested pursuant to the provisions of 10 CFR 50.55a(g)(5)(iii), the required examination coverage for the identified items are impractical and would require redesign to allow examination or to be replaced to enable inspection. Justification and the proposed alternative are included in the attachment to this letter. It is requested that this relief request be expedited, and NRC reply obtained before October 5, 1998, in order for it to be utilized at R.E. Ginna Nuclear Power Plant for the upcoming March 1999 outage.

Very truly yours,

Robert C. Mecredy

JSM/mab:503
Attachment

xc: Mr. Guy S. Vissing (Mail Stop 14B2)
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation
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Regional Administrator, Region I
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U.S. NRC Ginna Senior Resident Inspector

ATTACHMENT

Rochester Gas and Electric Corporation
Ginna Station
Docket No. 50/244
Third 10-Year Interval
Request for Relief No. 34
Component Support Integral Attachment Examination Limitations

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

This Relief Request is requested for three (3) supports. Inspections of these supports is addressed by Class 2, Category C-C, Item Number C3.20, Identified Component Support Integral Attachments Surface Examinations.

Support Number	Coverage Obtained	System
MSU-33	50%	Mainsteam (MS)
MSU-34	50%	Mainsteam (MS)
Penetration 140	82%	Residual Heat Removal (RHR)

II. Code Requirement:

ASME Code Section XI requires essentially 100% of the weld length to obtain code coverage. ASME Section XI Code Case N-460 states that if the entire examination volume or area cannot be examined due to interference by another component or part geometry, a reduction in coverage is acceptable provided that the coverage (the lack of) is less than 10%.

III. Code Requirement from Which Relief is Requested:

Relief is requested from examining 100% of the weld length for these 3 supports. Examining 100% of the weld length would be impractical, because the support would have to be redesigned or replaced to enable inspection. The amount of coverage obtained is estimated at 50% for MSU-33, 50% for MSU-34, and 82% for Penetration 140.

IV. Basis for Relief:

Relief is requested pursuant to the provisions of 10 CFR 50.55a(g)(5)(iii), the required examination coverage for the identified items are impractical and would require redesign to allow examination or to be replaced to enable inspection.

R.E. Ginna Nuclear Power Plant was designed and constructed to the B31.1, 1955 edition construction code. This code did not contain requirements to ensure that items be accessible for future examinations. The above noted integral attachments associated with the component supports or penetration anchor support were installed utilizing this construction code which did not provide for accessibility for future ISI NDE. Due to the limited design accessibility, ISI examinations cannot be performed on the inaccessible welds.

The two Main Steam supports (MSU-33 and MSU-34) are similar in design in that they have a complex gusset assembly that is welded to the process piping (integral attachment) and welded to the base plate which is secured to the concrete floor. Due to the small size of the gussets, access is limited for both the surface examination and surface preparation of the integral attachment welds located under the process piping. The achievable access percentage has been identified above within this relief request.

The penetration support assembly for Penetration 140 consists of a guard pipe that is secured to the Containment concrete and to the steel liner. The process pipe runs through the guard pipe and has an end plate welded to the process pipe (integral attachment) and welded to the guard pipe. Over the end plate, a segmented strong back reinforcement plate is welded on the end plate and guard pipe. The integral attachment weld is exposed on the process piping side, but the segmented strong back reinforcement plate partially covers the integral attachment weld/heat affected zone towards the end plate side. Due to this reinforcement plate covering the integral attachment partially on the end plate side, accessible coverage is limited as identified above within this relief request.

The identified component supports (including the integral attachments) are periodically visually examined (VT-3). ASME Section XI periodic leakage examinations are performed as well as Operator walkdowns as specified by Plant Operating Procedures. These operator walkdowns, periodic system leakage examinations and component support visual examinations provide additional assurances in maintaining plant safety.

V. Alternate Examinations:

R.E. Ginna Nuclear Power Plant proposes that the surface examination coverage identified above be acceptable with the addition of the visual (VT-3)examination, in fulfilling the code required examination coverage. The actual physical configuration of the components being examined is not conducive in obtaining the requirements specified within Code Case N-460.

VI. Justification for the Granting of Relief:

R.E. Ginna Nuclear Power Plant was designed and constructed to the B31.1, 1955 edition construction code. This code did not contain requirements to ensure that items be made accessible for future NDE examinations. Due to the original limited design accessibility, ISI examination coverage can not be obtained to the extent required by the current ASME Code.

The identified component supports (including the integral attachments) are currently being visually examined (VT-3). ASME Section XI periodic leakage examinations are performed as well as Operator walkdowns as specified by Plant Operating Procedures. These operator walkdowns, periodic system leakage examinations and component support visual examinations provide additional assurances in maintaining plant safety. The identified examination coverage for these items should be acceptable in fulfilling ASME Section XI coverage requirements.

Previous component support examinations were performed on these systems, in conformance to the Code requirements in effect for RG&E at those times. It should also be noted that Relief Request Number 34 is similar to RG&E's Relief Request Number 19, which was previously approved by the NRC.

VII. Implementation Schedule:

These examinations have been performed, and code credit shall be taken for the Third 10-year Interval inspection, upon approval of Relief Request Number 34.