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 AUTH.NAME AUTHOR AFFILIATION
 MECREDY,R.C. Rochester Gas & Electric Corp.
 RECIP.NAME RECIPIENT AFFILIATION
 VISSING,G.S.

SUBJECT: Requests relief per 10CFR50.55a(a)(3)(ii) from certain requirements of Section XI of ASME B&PV Code for ISI program.Relief request 41 encl.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

January 11, 1999

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 for First 10-Year Interval
for Containment (IWE and IWL)
Request for Relief No. 41
R.E. Ginna Nuclear Power Plant
Docket No. 50/244

References: EPRI "Containment Inspection Program Guide" GC-
110698, September 1998, and selected Relief
Request:

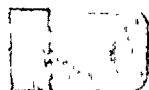
(1) Calvert Cliffs Relief Request L-1

Dear Mr. Vissing:

In the Federal Register, dated August 8, 1996 (61 FR 41303), the NRC amended its regulations to incorporate by reference the 1992 Edition and Addenda of Subsections IWE and IWL of Section XI of the ASME Code. Subsections IWE and IWL give the requirements for inservice inspection (ISI) of Class MC (metallic containment) and Class CC (concrete containment). These requirements are now applicable for R. E. Ginna Nuclear Power Plant.

The purpose of this letter is to request relief pursuant to 10 CFR 50.55a(a)(3)(ii) from certain requirements of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Rochester Gas and Electric is a participant in the Electric Power Research Institute (EPRI) project for the preparation of a Generic IWE/IWL Program and Industry Guide. This program was described to the NRC in a meeting on October 23, 1997, between the NRC, EPRI, and NEI, and several utilities. As a result from these meetings as well as the publication of the EPRI "Containment Inspection Program Guide" GC-110698, dated September 1998, Rochester Gas and Electric is submitting this relief request. Relief Request Number 41 is based on a generic relief request contained in the EPRI "Containment Inspection Program Guide".

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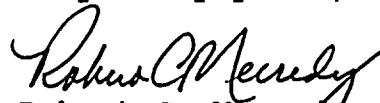


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Relief Request Number 41 requests relief from Section XI of the ASME Code, 1992 Edition, 1992 Addenda, Subarticle IWA-2210, "Visual Examination," which lists requirements for minimum illumination and maximum direct examination distance of Class CC components under paragraph IWL-2310, "Visual Examination and Personnel Qualification." When remotely performing the visual examinations required by Subsection IWL, Paragraph IWL-2510, the maximum direct examination distance specified in Table IWA-2210-1 may be extended, and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the techniques are qualified to detect the required conditions and indications.

The Relief Request, justification, and the proposed alternatives are included in the attachment to this letter. This relief request will be included in the Inservice Inspection Program for R.E. Ginna Nuclear Power Plant for the Third Interval Program (which ends December 31, 1999) and the Fourth Interval Program (which begins January 1, 2000). NRC approval of this relief request is desired before the end of June, 1999, to ensure these programs are in compliance with NRC requirements before the end of the Third Interval.

Very truly yours,


Robert C. McCreedy

Attachment

xc: Mr. Guy S. Vissing (Mail Stop 14B2)
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

U.S. NRC Ginna Senior Resident Inspector

ATTACHMENT

Rochester Gas and Electric Corporation
Ginna Station
Docket No. 50/244
First 10-Year Interval for Containment Inspection Program
Request for Relief No. 41
Containment Inspection Remote VT of Class CC

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

All components subject to the rules and requirements for Inservice Inspection of Class CC Concrete Components, Examination Category L-A, Concrete, Item L.1.11 as applicable to IWL-2310, Visual Examination and Personnel Qualification and IWA-2210, Visual Examinations.

II. Code Requirement:

ASME Section XI, 1992 Edition, 1992 Addenda, IWL-2310, Visual Examination and Personnel Qualification and IWA-2210, Visual Examinations requires specific minimum illumination and maximum direct examination distance for all concrete surfaces.

III. Code Requirement from Which Relief is Requested:

Relief is requested from Paragraph IWA-2210, Visual Examination Requirements for minimum illumination and maximum direct examination distance of Class CC components under Paragraph IWL-2310.

IV. Basis for Relief:

10 CFR 50.55a was amended in the Federal Register (61 FR 41303) to require the use of the 1992 Edition, 1992 Addenda, of Section XI when performing containment examinations. In addition to the requirements of Subsection IWL, the rulemaking also imposes the requirements of Subsection IWA of the 1992 Edition, 1992 Addendum, of ASME Section XI for minimum illumination and maximum direct examination distance of Class CC components, specifically for the examination of concrete under Paragraph IWL-2510. When remotely performing the visual examinations required by Subsection IWL Paragraph IWL-2510, the maximum direct examination distance specified in Table IWA-2210-1 may be extended, and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased.

IWA-2210 allows for remote examination as long as the remote examination procedure is demonstrated to resolve the selected test chart characters. The Registered Professional Engineer (RPE) will identify minimum size of indications of interest. For remote visual examination, the procedure and equipment to be used will be demonstrated capable of resolving these minimum indications to the satisfaction of the RPE and the Authorized Nuclear Insurance Inspector (ANII), as allowed in IWA-2240, "Alternative Examinations." The record of demonstration will be available to Regulatory Authorities.

Accessibility to higher portions of the dome and the containment building itself make it a hardship to obtain the maximum direct examination distance and minimum illumination requirements. The installation of extensive temporary scaffold systems or a climbing scaffold system to access these portions of the containment would be necessary. These scaffolds would provide limited access due to containment geometry restrictions as well as structural and equipment interferences. The installation and removal of these scaffolds would increase both worker radiation exposure and personnel safety in order to meet Paragraph IWA-2210 requirements.

The NRC staff received seven comments that were consolidated into Public Comment # 2.3 in Part III of Attachment 6A to SECY-96-080. The Staff response to these concerns is as follows:

"Comments received from ASME members on the containment committees indicate that the newer, more stringent requirements of IWA-2210 were not intended to be used for the examination of containments and were inadvertently included in Subsection IWL. The NRC agrees that remote examinations are the only practical method for inspecting much of the containment surface area. § 50.55a(b) (2) (x) (B) has been added to the final rule which contains alternative lighting and resolution requirements which may be used in lieu of the requirements contained in IWA-2210-1."

However, as specified within 10 CFR 50.55a(b) (2) (x) (B) of the final rule, this alternative applies only to Subsection IWE, and not to Subsection IWL.

Relief is requested in accordance with 10 CFR 50.55a(a) (3) (ii). Compliance with the original requirements of this section would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

V. Alternate Examinations:

When performing remotely the visual examinations required by Subsection IWL, Paragraph IWL-2510 , the maximum direct examination distance specified in Table IWA-2210-1 may be extended, and the minimum illumination requirements specified in Table IWA-2210-1 may be decreased provided that the conditions or indications for which the visual examination is performed can be detected at the chosen distance and illumination.

VI. Justification for the Granting of Relief:

This Relief Request is similar to Relief Request L-1 submitted by Calvert Cliffs as one of the EPRI "Containment Inspection Program Guide" Pilot Plant Relief Requests. Relief Request L-1 (for Calvert Cliffs) was subsequently approved by the NRC. Refer to a letter from the NRC (S. Bajwa) to Baltimore Gas and Electric (C. Cruse), dated November 16, 1998 (Docket No. 50-317/318). This Relief Request will minimize Ginna operating and maintenance cost without decreasing the level of quality and safety.

VII. Implementation Schedule:

Relief is requested for the first inspection interval for the IWL Containment Inspection Program (1996 - 2008). Note that this interval overlaps the Third and Fourth 10-Year Interval inspections of the Ginna Inservice Inspection Program.