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 VISSING, G.S.

SUBJECT: Requests relief per to 10CFR50.55a(a)(3)(ii) from certain
 requirements of Section XI of ASME B&PV Code for ISI
 program. Relief request 40 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. 40
R.E. Ginna Nuclear Power Plant
Docket No. 50/244

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)(i) 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 40 requests relief from Section XI of the ASME Code, 1992 Edition, 1992 Addenda, Subarticle IWE-5240, which requires a VT-2 visual examination following repair, replacement or modification. A VT-2 examination for evidence of air leakage will not provide effective detection of leakage. Later editions and addendas of the code no longer contain this requirement. Testing in accordance with 10 CFR 50 Appendix J will be performed.

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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. Mecredy

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
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475 Allendale Road
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U.S. NRC Ginna Senior Resident Inspector

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ATTACHMENT

Rochester Gas and Electric Corporation
Ginna Station
Docket No. 50/244
First 10-Year Interval for Containment Inspection Program
Request for Relief No. 40
Containment Inspection VT-2 After Repair, Replacement
or Modification

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

All components subject to the rules and requirements for repair, replacement or modification of Class MC, IWE-5000 system pressure testing visual examination in accordance with the 1992 Edition, 1992 Addenda of ASME Section XI.

II. Code Requirement:

Paragraph IWE-5240 of the 1992 Edition, 1992 Addenda of ASME Section XI requires that the requirements of Paragraph IWA-5240 for visual examination, VT-2, are applicable following repair, replacement or modification.

III. Code Requirement from Which Relief is Requested:

Relief is requested from performing the VT-2 visual examination in connection with system pressure testing following repair, replacement or modification under Article IWE-5000.

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. Paragraph IWE-5210 states that except as noted within Paragraph IWE-5240, the requirements of Article IWA-5000 are not applicable to Class MC or Class CC components. Paragraph IWE-5240 states that the requirements of Paragraph IWA-5240 (corrected from IWA-5246 to IWA-5240 in the 1993 Addenda) for visual examinations are applicable. Paragraph IWA-5240 identifies a "VT-2" visual examination. VT-2 examinations are conducted to detect evidence of leakage from pressure-retaining components, with or without leakage

collection systems, as required during the conduct of a system pressure test. In addition, personnel performing VT-2 examinations are required to be qualified in accordance with Subarticle IWA-2300 of ASME Section XI.

For repairs, replacements or modifications that are performed under ASME Section XI Code, applicable Construction Code (or Installation Code) non-destructive examinations (NDE) are performed and must meet the acceptance criteria of the Construction / Installation Code. In addition to the Construction Code NDE, applicable ASME Section XI NDE pre-service NDE are also performed. These Construction Code and Section XI pre-service NDE requirements provide additional assurances that the repairs, replacements or modifications are sound and leak-tight.

Table IWE-2500-1, Examination Category E-P, identifies the examination method of 10 CFR 50, Appendix J and does not specifically identify a VT-2 visual examination. 10 CFR 50, Appendix J provides requirements for testing as well as acceptable leakage criteria. These tests are performed by Appendix J "Test" personnel and utilize calibrated equipment to determine acceptability. Additionally, 10 CFR 50.55a(b)(2)(x)(E) requires a general visual examination of the containment each period that would identify any structural degradation that may contribute to leakage. A "VT-2" visual examination will not provide additional assurance of safety beyond that of current Appendix J practices.

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i). The proposed alternative (pressure testing in accordance with 10 CFR 50, Appendix J) will provide an acceptable level of quality and safety.

The reference to paragraph IWA-5240 has been removed in the 1997 Addenda of ASME Section XI. This addenda has been approved by the ASME Main Committee and should be published in 1998.

V. Alternate Examinations:

Testing shall be conducted in accordance with 10 CFR 50, Appendix J, in lieu of Paragraph IWE-5240 of ASME Section XI.

VI. Justification for the Granting of Relief:

For repairs, replacements or modifications that are performed under ASME Section XI Code, applicable Construction Code (or Installation Code) non-destructive examinations (NDE) are performed and must meet the acceptance criteria of the Construction / Installation Code. In addition to the Construction Code NDE, applicable ASME Section XI NDE pre-service NDE are also performed. These Construction Code and Section XI pre-service NDE requirements provide additional assurances that the repairs, replacements or modifications are sound and leak-tight. 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 IWE Containment Inspection Program (1996 - 2008). Note that this interval overlaps the Third and Fourth 10-Year Interval inspections of the Ginna Inservice Inspection Program.