

# CATEGORY 1

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

SUBJECT: Informs util wishes to amend extent of alternate exams  
 provided for relief request re ISI program ASME Section XI  
 require exams for first 10-Yr interval for containment.

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June 21, 1999

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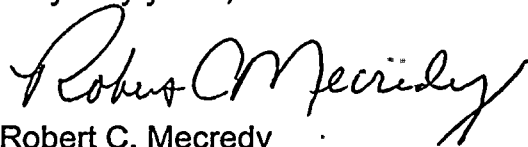
Subject: Inservice Inspection Program ASME Section XI  
Required Examinations for First 10-Year Interval for Containment  
(IWE and IWL)  
Request for Relief No. 40  
R.E. Ginna Nuclear Power Plant  
Docket No. 50/244

Dear Mr. Vissing:

RG&E provided the NRC with the subject relief request on January 11, 1999. As a result of a telecon with NRC staff on June 16, 1999, RG&E wishes to amend the extent of the alternate examinations provided for in that relief request.

In addition to the testing to be conducted in accordance with 10CFR 50 Appendix J, RG&E will perform an IWE detailed visual examination of the repaired or replaced area (VT-1). A replacement page of the attachment to our January 11, 1999 relief request is provided.

Very truly yours,

  
Robert C. Mecredy

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9906290269 990621  
PDR ADDCK 05000244  
Q PDR

xc: Mr. Guy S. Vissing (Mail Stop 8C2)  
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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 and 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, as well as performing an IWE detailed visual examination of the repaired or replaced area (VT-1).

