

CATEGORY 1

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

SUBJECT: Requests approval for use of Relief Request number 43 to address volumetric examination limitations (less than 90%) associated with A & B RHR heat exchanger outlet nozzle to shell welds. Approval is requested by Dec 31, 2000.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

October 5, 1999

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

Subject: Inservice Inspection Program ASME Section XI Required Examinations
Third 10-Year Interval
Relief Request No. 43
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

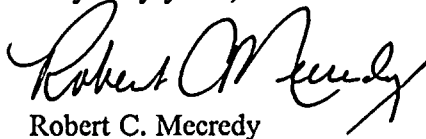
Dear Mr. Vissing:

The purpose of this letter is to seek approval for the use of Relief Request Number 43 to address volumetric examination limitations (less than 90%) associated with the A and B Residual Heat Removal Heat Exchanger Outlet Nozzle to Shell Welds.

This Relief is requested for two (2) welds pursuant to the provisions of 10CFR50.55a (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 concerning limitations are included in the attachment to this letter.

Since this relief request is for our 3rd 10-year interval ISI program, which ends December 31, 1999, approval is requested by December 31, 2000 in accordance with 10CFR50.55a (g)(5)(iv).

Very truly yours,



Robert C. Mecredy

Attachment

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Mr. Guy S. Vissing (Mail Stop 8C2)
Project Directorate I
Division of Licensing Project Management
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

Genoa Station

Docket No. 50/244

Third 10-Year Interval

Request for Relief No. 43

Residual Heat Removal (RHR) Heat Exchanger Outlet Nozzle Welds Examination Limitations

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

This Relief Request pertains to two (2) Residual Heat Removal (RHR) Heat Exchanger Outlet Nozzle to Shell Welds, ASME Class 2, Category C-B, Item C2.32. There is one nozzle of this type associated with each of the two identical RHR Heat Exchangers. The Code requires that the examination be performed when the component is opened. Both Heat Exchangers were opened and Volumetrically examined. Limited coverage is identified below.

<u>Summary #</u>	<u>Weld ID</u>	<u>Exam Coverage</u>	<u>Limitations</u>
169253	ONSRHE-1B	79%	due to internal welded separation plate
169053	ONSRHE-1A	79%	due to internal welded separation plate

II. ASME Section XI Code Requirement:

ASME Section XI Code requires essentially 100% of the weld length or area to obtain 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. Requirement from Which Relief is Requested:

Relief is requested from examining 100% of the weld length or areas for these two (2) identified items. Examining 100% of the weld length or areas would be impractical due to original design interference.

Request for Relief No. 43

IV. Basis for Relief/Exemption:

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.

The two identical Residual Heat Removal (RHR) Heat Exchangers was designed and constructed to ASME Section VIII, 1965 Edition. This code did not contain requirements to ensure that items be accessible for future examinations. The two (2) ASME Class 2 items identified above were installed utilizing this construction code which did not provide for accessibility for future ISI NDE. The ISI ASME Section XI volumetric requirement is identified within Table IWC-2500-1, Category C-B, Item Number C2.32.

The Residual Heat Removal (RHR) Heat Exchangers is part of the ASME Section XI VT-2 Leakage Examination boundary. Leakage Examinations are performed each period as required by Category C-B, Item Number C2.33 of the Code to insure pressure boundary integrity. In addition to the ASME Section XI leakage examinations, Operator walkdowns as specified by Plant Operating Procedures are also performed. The combination of operator walkdowns and period leakage examinations that are performed provide additional assurances in maintaining plant safety.

V. Alternate Examinations:

R.E. Ginna Nuclear Power Plant proposes that the volumetric examination coverage identified above be acceptable in fulfilling required volumetric examination coverage.

VI. Justification for the Granting of Relief:

The Residual Heat Removal (RHR) Heat Exchangers were designed and constructed to ASME Section VIII, 1965 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, examination coverage can not be obtained to the extent required by the current ASME Code.

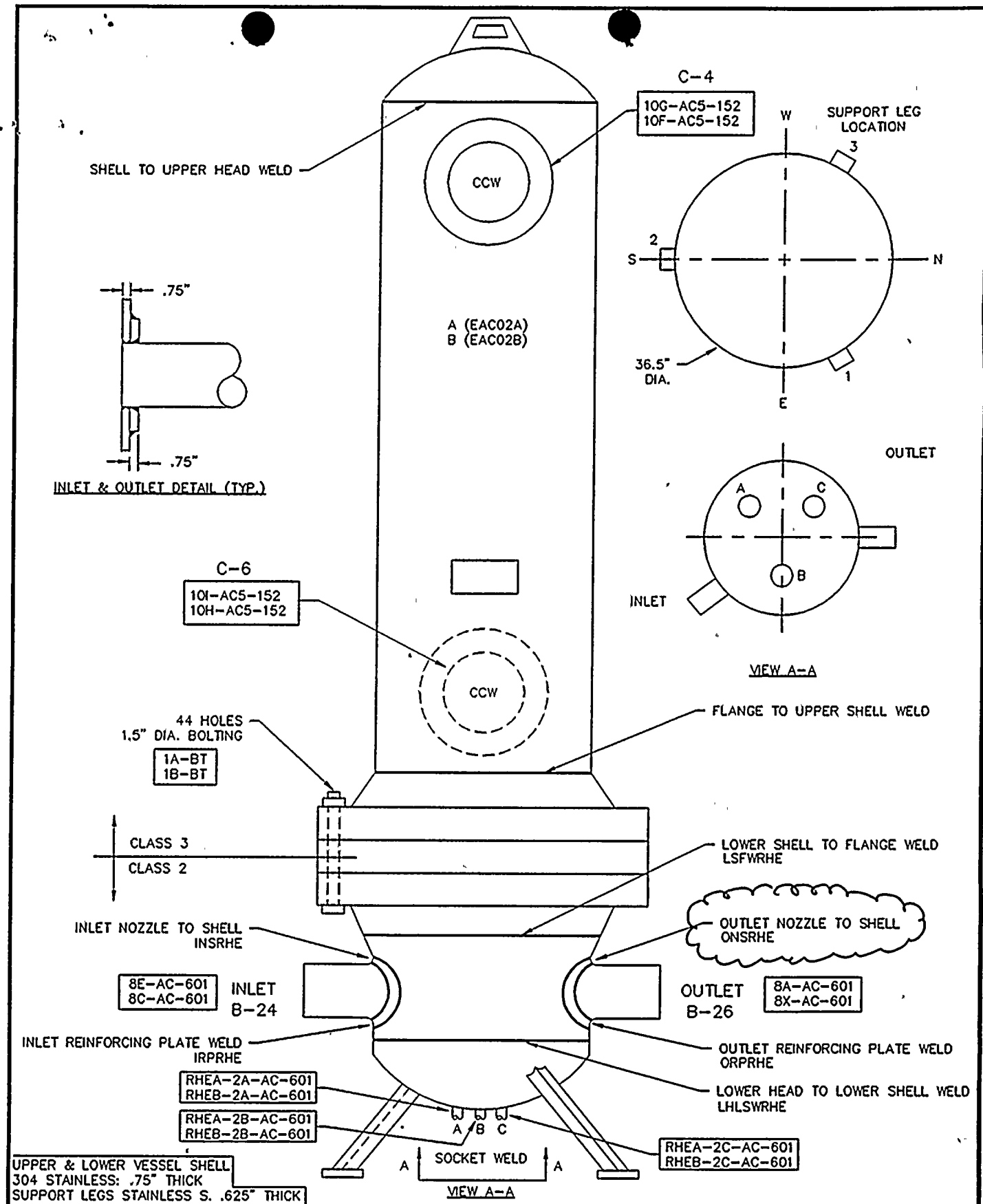
ASME Section XI periodic leakage examinations are performed as well as Operator walkdowns as specified by Plant Operating Procedures. These operator walkdowns and periodic system leakage examinations provide additional assurances in maintaining plant safety. The identified volumetric examination coverage for these items should be acceptable in fulfilling coverage requirements.

Request for Relief No. 43

It should also be noted that Relief Request Number 43 is similar to RG&E's Relief Request Number 19 and 34, which were 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.



LINE NO:	CALIBRATION BLOCK:	RESIDUAL HEAT REMOVAL HT EXCHANGERS		
.	.	FACILITY <i>R.E. GINNA</i>		
.	.	ROCHESTER GAS & ELECTRIC CORP.		
.	.	ROCHESTER, NEW YORK		
.	REF. DRAWING:	DRAWN BY: ABG	DRAWING NUMBER	REV.
.	WESTINGHOUSE 4807-1	DATE: 11/1/95	B-109	3
.	33013-1247	REVIEWED BY: FAK		