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SORENSEN, G. C. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Requests that Relief Request ISI-2-002 be considered as submitted in inservice insp plan & that NRC evaluation of Request PSI-2-003 be used as addl justification. Page from 860731 ltr re staff evaluation of PSI-2-003 encl.

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November 4, 1986
G02-86-986

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attn: Ms. E. G. Adensam, Project Director
BWR Project Directorate No. 3
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Ms. Adensam:

Subject: NUCLEAR PLANT NO. 2
INSERVICE INSPECTION PROGRAM
ADDITIONAL INFORMATION

Reference:
1) Letter, G. C. Sorensen to W. R. Butler, G02-85-274, dated 5/29/85, "Inservice Inspection Program Plan Request for Relief"
2) Letter, G. C. Sorensen to E. G. Adensam, G02-86-679 dated 7/22/86, "Inservice Inspection and Inservice Testing Programs and Response to Request for Information"
3) Telecon, 9/15/86, J. Mudlin (INEL) and J. Bradfute (NRC) to P. Powell and T. Hoyle (SS)
4) Telecon, 10/15/86, P. Powell, T. Hoyle and D. Ramey (SS) to J. Bradfute and B. Turovlin (NRC)
5) Letter, E. G. Adensam to G. C. Sorensen, "WNP-2 CPPR-03 Preservice Inspection Program Plan, Request for Relief", dated 7/31/86

In a recent telephone conversation (Reference 3), Mr. Mudlin, an NRC Contractor reviewing the WNP-2 Inservice Inspection (ISI) Program, requested additional information on WNP-2 Request for Relief ISI-2-006 which is contained in the ISI Plan and was submitted per Reference 1). This relief request seeks relief from the ASME Section XI code requirement to perform a pneumatic test on the Main Steam Relief Valve (MSRV) discharge lines based on the Supply System's contention that the test was of little value.

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In a follow-up telephone conversation (Reference 4), Mr. Turovlin (NRC) explained that it was the NRC's position not to grant relief from Code examinations except where the utility could show the required examination or test was impractical, regardless of the technical merit of the exam. Based on the above, the Supply System has decided to withdraw relief request ISI-2-006.

In the Reference 4) telephone conversation, a discrepancy between a Preservice Inspection (PSI) and ISI relief request was identified by the Supply System. The Supply System had requested relief per ISI-2-002 contained in the WNP-2 ISI Plan to use an ultrasonic calibration standard which did not meet the Code requirements of being the same thickness as that specified for the pipe being examined to perform ultrasonic examinations. This relief request was the same as PSI relief request PSI-2-003. The NRC questioned the use of the calibration standard and the Supply System subsequently withdrew ISI-2-002 via Reference 2).

Subsequent to our withdrawal of ISI-2-002, the NRC completed their review of the PSI relief requests and approved PSI-2-003 (Reference 5). In their evaluation, the NRC states: "this more conservative examination (using the non-code thickness calibration standard) will be continued during inservice inspections."

Because of this inconsistency, Mr. Turovlin asked that we rescind our withdrawal of ISI-2-002 as contained in Reference 2), and use the NRC's evaluation on the PSI-2-003 as additional justification for relief request ISI-2-002.

The Supply System concurs with Mr. Turovlin's suggestion and we hereby request that relief request ISI-2-002 be considered as submitted in the ISI plan. Attached is page 11 of Reference 5) which contains the Staff's evaluation on PSI-2-003.

If the Staff has further questions on this subject, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

GC Sorensen

G. C. Sorensen, Manager
Regulatory Programs

TFH/bk
Attachment

cc: JO Bradfute - NRC
JB Martin - NRC RV
J Mudlin - INEL
E Revell - BPA
NS Reynolds - BLCP&R
B Turovlin - NRC
NRC Site Inspector

Reason for Request:

The calibration block used for the examinations was 4 inch schedule 40 where the piping is 4 inch schedule 80. An error in the construction specification led to the use of the wrong schedule calibration block. A review of the examinations using the schedule 40 calibration block instead of the schedule 80 block concluded that the examinations actually performed were more sensitive than required by the Code. The weld thickness was approximately 0.3 inches, while the calibration block is 0.24 inches thick.

Staff Evaluation:

The staff finds the relief request acceptable because:

1) The plant quality and safety is not compromised by using the schedule 40 calibration block instead of the schedule 80 calibration block. The use of the schedule 40 block will result in a more sensitive examination (thinner material, therefore, smaller notch for calibration reference).

2) This more conservative examination will be continued during the inservice inspections.