

PRIORITY 1

(ACCELERATED RIDS PROCESSING)

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AUTH. NAME AUTHOR AFFILIATION
PARRISH, J.V. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Requests review & approval of relief request for exam category C-G pump casing welds to support planning for Spring, 1997 & Spring, 1998 refueling outages.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Docket No. 50-397

October 6, 1995
GO2-95-208

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
SECOND 10-YEAR INSERVICE INSPECTION PROGRAM PLAN
RELIEF REQUEST FOR EXAMINATION CATEGORY C-G PUMP
CASING WELDS**


References: Letter GO2-94-286, dated December 27, 1994, JV Parrish (SS) to NRC, "Second 10-Year Inservice Inspection Program Plan"

This letter submits for NRC approval relief request 2ISI-15. In accordance with 10CFR50.55a(g)(6)(i), the Supply System requests relief from performing a surface examination per ASME Section XI, 1989 Edition with no Addenda, Subarticle IWC-2400 of Examination Category C-G pumps' casing welds until the pumps are disassembled for maintenance. This relief request is based on the hardship it will cause the Supply System to disassemble the pumps for the sole purpose of performing the examinations. The relief request is provided as Attachment 1 and applies to the second 10-year Inservice Inspection Program Plan which was submitted with the referenced letter. Attachment 2 contains the ISI Program Plan Table 9.1.4 pages revised by this relief request.

Review and approval of this relief request is requested prior to October 1, 1996 to support planning for the Spring, 1997 and Spring, 1998 refueling outages.

Should you have any questions or desire additional information regarding this matter, please call me or D. A. Swank at (509) 377-4563.

Sincerely,


J. V. Parrish (Mail Drop 1023)
Vice President, Nuclear Operations

DPR/dpr

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NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

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9510170394 951006
PDR ADOCK 05000397
PDR

AD471

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-15

Welds for Which Relief is Requested

ASME Section XI Examination Category C-G, Code item number C6.10, pressure retaining welds in pumps and valves.

<u>Ident. No.</u>	<u>Description</u>	<u>Item No.</u>	<u>ISI Diagram No.</u>
RHR-P-2A			
RHR-P-2AC-1	PMP CAS/CIR WLD ¹	C6.10	RHR-213
RHR-P-2AC-2	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2AC-3	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2AC-4	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2AC-5	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2AN-1	PMP NOZZLE WELD ²	C6.10	RHR-213
RHR-P-2AN-2	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2AN-3	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2AL-1	PMPCAS/LONG.WLD ³	C6.10	RHR-213
RHR-P-2AL-2	PMPCAS/LONG.WLD	C6.10	RHR-213
RHR-P-2B			
RHR-P-2BC-1	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2BC-2	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2BC-3	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2BC-4	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2BC-5	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2BN-1	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2BN-2	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2BN-3	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2BL-1	PMPCAS/LONG.WLD	C6.10	RHR-213
RHR-P-2BL-2	PMPCAS/LONG.WLD	C6.10	RHR-213
RHR-P-2BL-3	PMPCAS/LONG.WLD	C6.10	RHR-213

¹ Pump casing circumferential weld

² Pump nozzle weld

³ Pump casing longitudinal weld

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-15

RHR-P-2C

RHR-P-2CC-1	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2CC-2	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2CC-3	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2CC-4	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2CC-5	PMP CAS/CIR WLD	C6.10	RHR-213
RHR-P-2CN-1	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2CN-2	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2CN-3	PMP NOZZLE WELD	C6.10	RHR-213
RHR-P-2CL-1	PMPCAS/LONG.WLD	C6.10	RHR-213
RHR-P-2CL-2	PMPCAS/LONG.WLD	C6.10	RHR-213
RHR-P-2CL-3	PMPCAS/LONG.WLD	C6.10	RHR-213

HPCS-P-1

HPCS-P-1C-1	PMP CAS/CIR WLD	C6.10	HPCS-206-1
HPCS-P-1C-2	PMP CAS/CIR WLD	C6.10	HPCS-206-1
HPCS-P-1C-3	PMP CAS/CIR WLD	C6.10	HPCS-206-1
HPCS-P-1C-4	PMP CAS/CIR WLD	C6.10	HPCS-206-1
HPCS-P-1C-5	PMP CAS/CIR WLD	C6.10	HPCS-206-1
HPCS-P-1C-6	PMP CAS/CIR WLD	C6.10	HPCS-206-1
HPCS-P-1C-7	PMP CAS/CIR WLD	C6.10	HPCS-206-1
HPCS-P-1N-1	PMP NOZZLE WELD	C6.10	HPCS-206-1
HPCS-P-1N-1	PMP NOZZLE WELD	C6.10	HPCS-206-1
HPCS-P-1N-2	PMP NOZZLE WELD	C6.10	HPCS-206-1
HPCS-P-1L-1	PMPCAS/LONG.WLD	C6.10	HPCS-206-1
HPCS-P-1L-2	PMPCAS/LONG.WLD	C6.10	HPCS-206-1
HPCS-P-1L-3	PMPCAS/LONG.WLD	C6.10	HPCS-206-1

LPCS-P-1

LPCS-P-1C-1	PMP CAS/CIR WLD	C6.10	LPCS-208-1
LPCS-P-1C-2	PMP CAS/CIR WLD	C6.10	LPCS-208-1
LPCS-P-1C-3	PMP CAS/CIR WLD	C6.10	LPCS-208-1
LPCS-P-1C-4	PMP CAS/CIR WLD	C6.10	LPCS-208-1
LPCS-P-1C-5	PMP CAS/CIR WLD	C6.10	LPCS-208-1
LPCS-P-1N-1	PMP NOZZLE WELD	C6.10	LPCS-208-1
LPCS-P-1N-2	PMP NOZZLE WELD	C6.10	LPCS-208-1

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-15

LPCS-P-1N-3	PMP NOZZLE WELD	C6.10	LPCS-208-1
LPCS-P-1L-1	PMPCAS/LONG.WLD	C6.10	LPCS-208-1
LPCS-P-1L-2	PMPCAS/LONG.WLD	C6.10	LPCS-208-1
LPCS-P-1L-3	PMPCAS/LONG.WLD	C6.10	LPCS-208-1

Section XI Requirements

Section XI, Table IWC-2500-1, Examination Category C-G, items C6.10 requires a surface examination of the weld and adjacent base metal. The examination can be performed from either the inside or outside of the pump casing. Per subarticle IWC-2400 "Inspection Schedule", the required examinations in each Examination Category shall be completed each inspection interval in accordance with Table IWC-2412-1. This table requires that approximately one third of the items in each category be examined each inspection period (3 to 4 year intervals).

Code Requirement from Which Relief is Requested

Relief is requested from the requirements of IWC-2400 for Examination Category C-G welds of pumps HPCS-P-1, LPCS-P-1, RHR-P-2A, RHR-P-2B, and RHR-P-2C. This requires approximately one third of the welds be examined each inspection period.

Basis for Relief

Relief is requested on the basis that examination of these welds to the schedule required by IWC-2400 places a hardship on the plant. The subject pumps were designed prior to the requirement to perform Class 2 component examinations for inservice inspection. The upper flange for the pumps are located at floor level and the casings are embedded in a pump pit which does not allow access to the outside surface of the pumps. Due to the inaccessibility of the pumps it is impractical to perform the nondestructive examinations required by IWC-2400. The pump welds are accessible for examination from the pump internal surfaces. To meet the requirements of IWC-2400, the pump would require disassembly and removal of the pump impeller. At least one pump would be required to be disassembled each inspection period. A pump disassembly would result in a large expenditure of manhours and accompanying personnel exposure. This expenditure of manhours and personnel exposure for the sole purpose of performing nondestructive examination of the pump casings is considered a hardship. Figures 1, 2, and 3 illustrate the installation details for the pumps.

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-15

Alternative Examinations

When pumps HPCS-P-1, LPCS-P-1, RHR-P-2A, RHR-P-2B, and RHR-P-2C are disassembled for maintenance, to the degree that the welds are accessible for examination, the requirements of Code Examination Category C-G will be implemented for the disassembled pumps. The examination will be performed on accessible areas of the welds as defined in ASME Section XI Figure IWC-2500-8. Since pumps RHR-P-2A, RHR-P-2B, and RHR-P-2C are of the same design and perform similar functions only one of these pumps will be examined during the inspection interval (Section XI, Table IWC-2500-1, Examination Category C-G, note 1), if they are disassembled.

Justification for the Granting of Relief

This relief request should be granted for the following reasons:

1. It is estimated to take at least 3 days to disassemble a pump and at least another 4 days to reassemble the pump. The general area dose on the inside of the pipe and pump is calculated to be 200 mrem/hr. This would result in a large expenditure of manhours and personnel dose to perform the nondestructive examination.
2. The accessible portions of the welds will be examined when the pumps are disassembled for maintenance. This examination of welds and base metal should detect generic degradation of the pump casing welds.
3. The pumps are routinely tested for operability per plant Technical Specifications and are subject to periodic system pressure tests per the requirements of ASME Section XI.
4. Pump operating conditions (i.e. flow, pressure) are available to the control room operators and control room annunciators are provided to alert plant operators to abnormal operating conditions.
5. Plant procedures are in place for the operators to respond to abnormal pump conditions (i.e. pump failure) and redundant safety systems exist if a pump were to become inoperable..
6. The casing welds for pumps RHR-P-2A, RHR-P-2B, and RHR-P-2C underwent a magnetic particle preservice inspection examination from the internal surface of the pumps prior to plant startup. The HPCS-P-1 and LPCS-P-1 pumps were not required to undergo a preservice inspection.

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-15

The measures taken by the alternative examinations and the routinely scheduled surveillances and testing identified above ensure plant safety is maintained.

Implementation Schedule

This relief request will be implemented during the second inservice inspection interval.

RELIEF REQUEST NO. 2ISI-15

NOTES:

1. THIS DRAWING IS INTENDED FOR USE IN PRESERVICE AND INSERVICE INSPECTION PROGRAMS ONLY.
2. CASING MATERIALS ARE SA516 GR.70 PLATE.
3. PREFIX HPCS-P-1 IS LEFT OFF EACH WELD NUMBER FOR CLARITY.

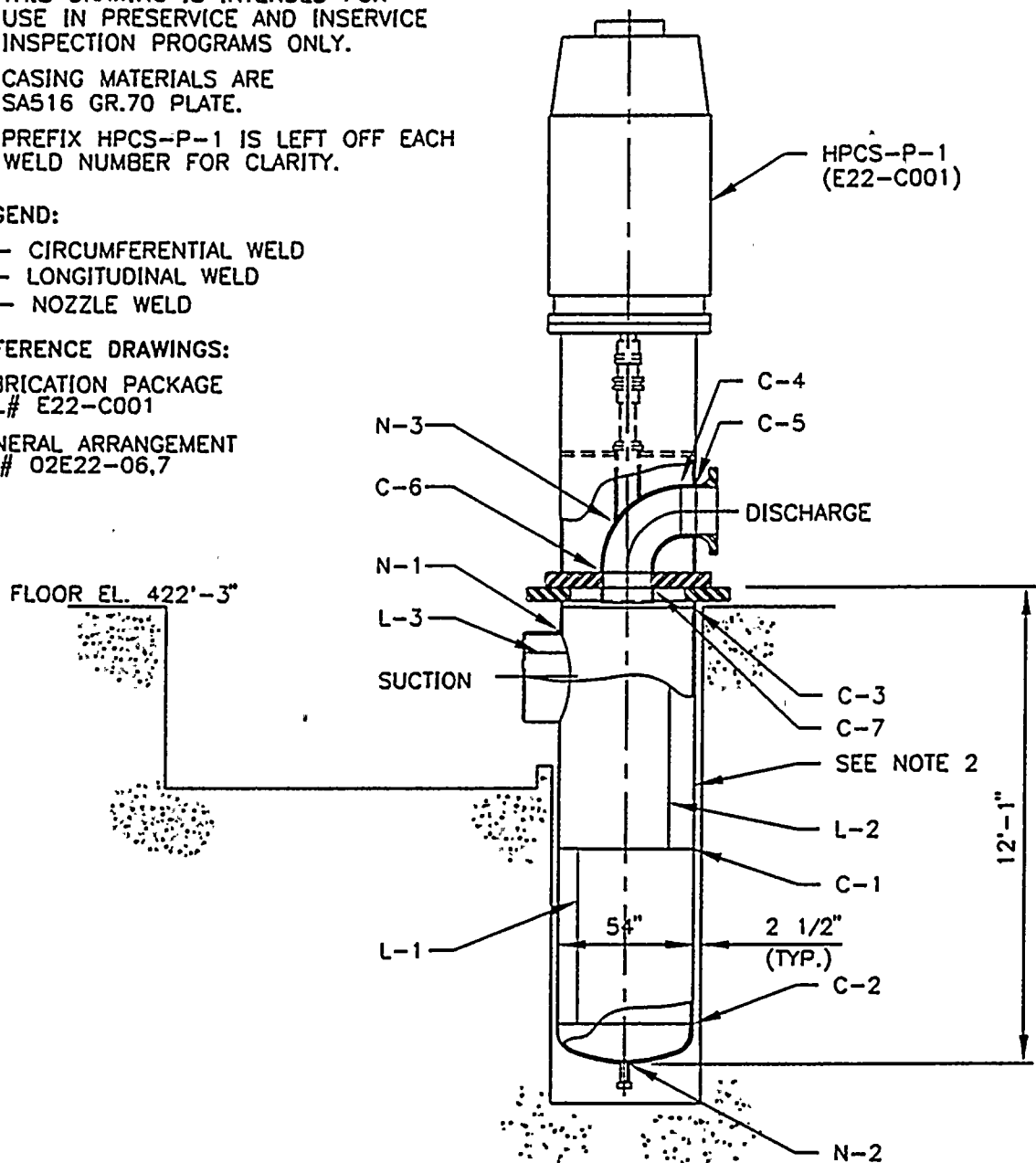
LEGEND:

C - CIRCUMFERENTIAL WELD
L - LONGITUDINAL WELD
N - NOZZLE WELD

REFERENCE DRAWINGS:

FABRICATION PACKAGE
MPL# E22-C001

GENERAL ARRANGEMENT
CVI# 02E22-06,7



WASHINGTON PUBLIC POWER
SUPPLY SYSTEM

REV	DATE	DESCRIPTION	DWN CHK	APVD	WELD AND COMPONENT IDENTIFICATION DIAGRAM HPCS-P-1 (E22-C001)		
0	9-1-95	NEW ISSUE DRAWING	DLE DPA	<i>[Signature]</i>			
DRAWN	DATE	CHECKED	DATE	APPROVED	DATE	DWG NO.	REV.
O.L. EHR	9-1-95	<i>DPA</i>	9-22-95	<i>[Signature]</i>	9/22/95	HPCS-206-1 SH 1 OF 1	0

POS2-AV RO (8/94)

FIGURE 1 FILE NAME

RELIEF REQUEST NO. 2ISI-15

NOTES:

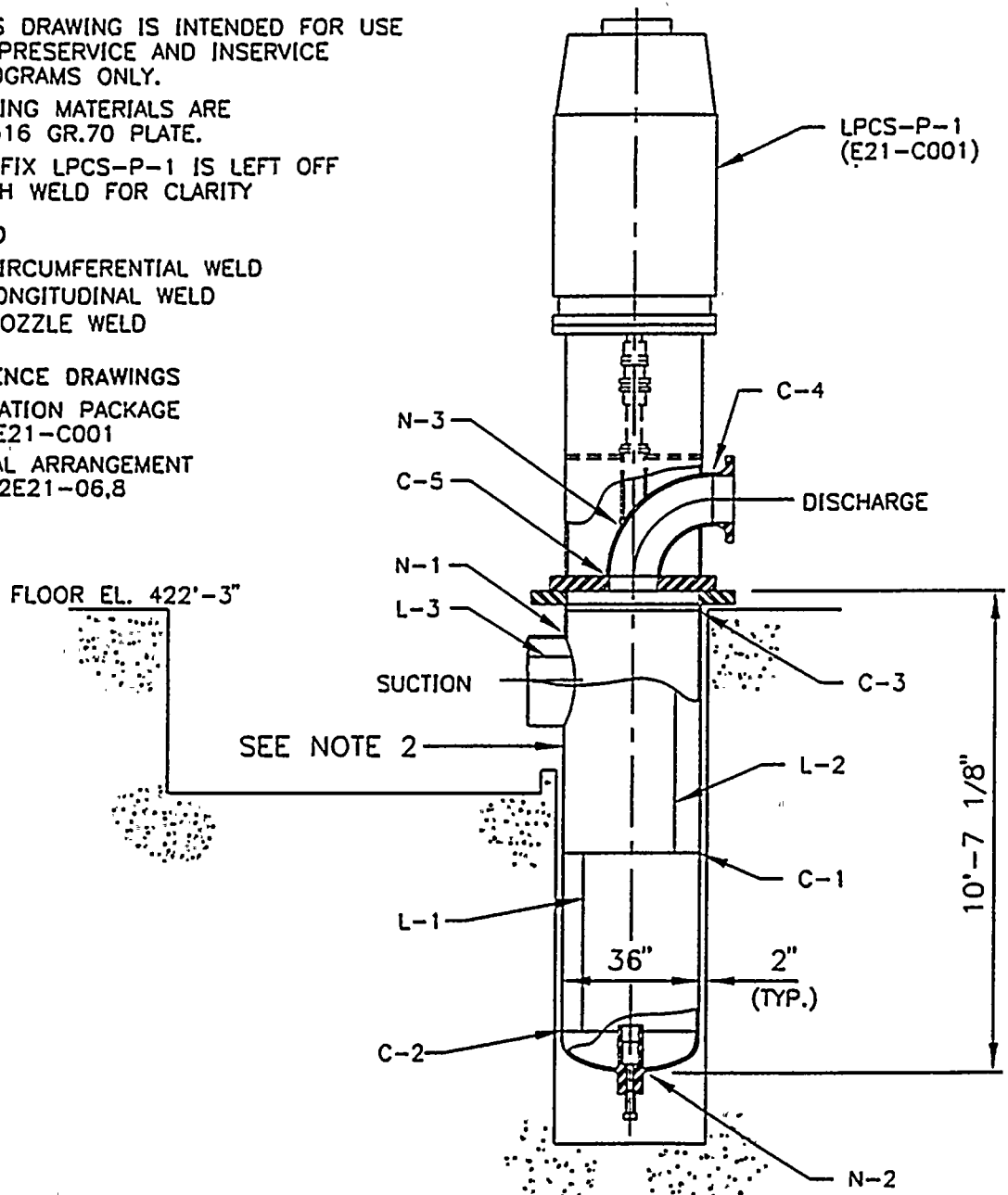
1. THIS DRAWING IS INTENDED FOR USE IN PRESERVICE AND INSERVICE PROGRAMS ONLY.
2. CASING MATERIALS ARE SA516 GR.70 PLATE.
3. PREFIX LPCS-P-1 IS LEFT OFF EACH WELD FOR CLARITY

LEGEND

C - CIRCUMFERENTIAL WELD
L - LONGITUDINAL WELD
N - NOZZLE WELD

REFERENCE DRAWINGS

FABRICATION PACKAGE
MPL# E21-C001
GENERAL ARRANGEMENT
CVI# 02E21-06.8



WASHINGTON PUBLIC POWER
SUPPLY SYSTEM

REV	DATE	DESCRIPTION	OWN CHK	APVD	WELD AND COMPONENT IDENTIFICATION DIAGRAM LPCS-P-1 (E21-P001)			
0	9-1-95	NEW ISSUE DRAWING	DLE JPK	Cat				
DRAWN	DATE	CHECKED	DATE	APPROVED	DATE	DWG NO.	SH 1 OF 1	REV.
O.L. EHR	9-1-95	DPR	7-22-95	Cat	7-22-95	LPCS-208-1		0

POS2-AV RD (8/94)

FILE NAME

FIGURE 2

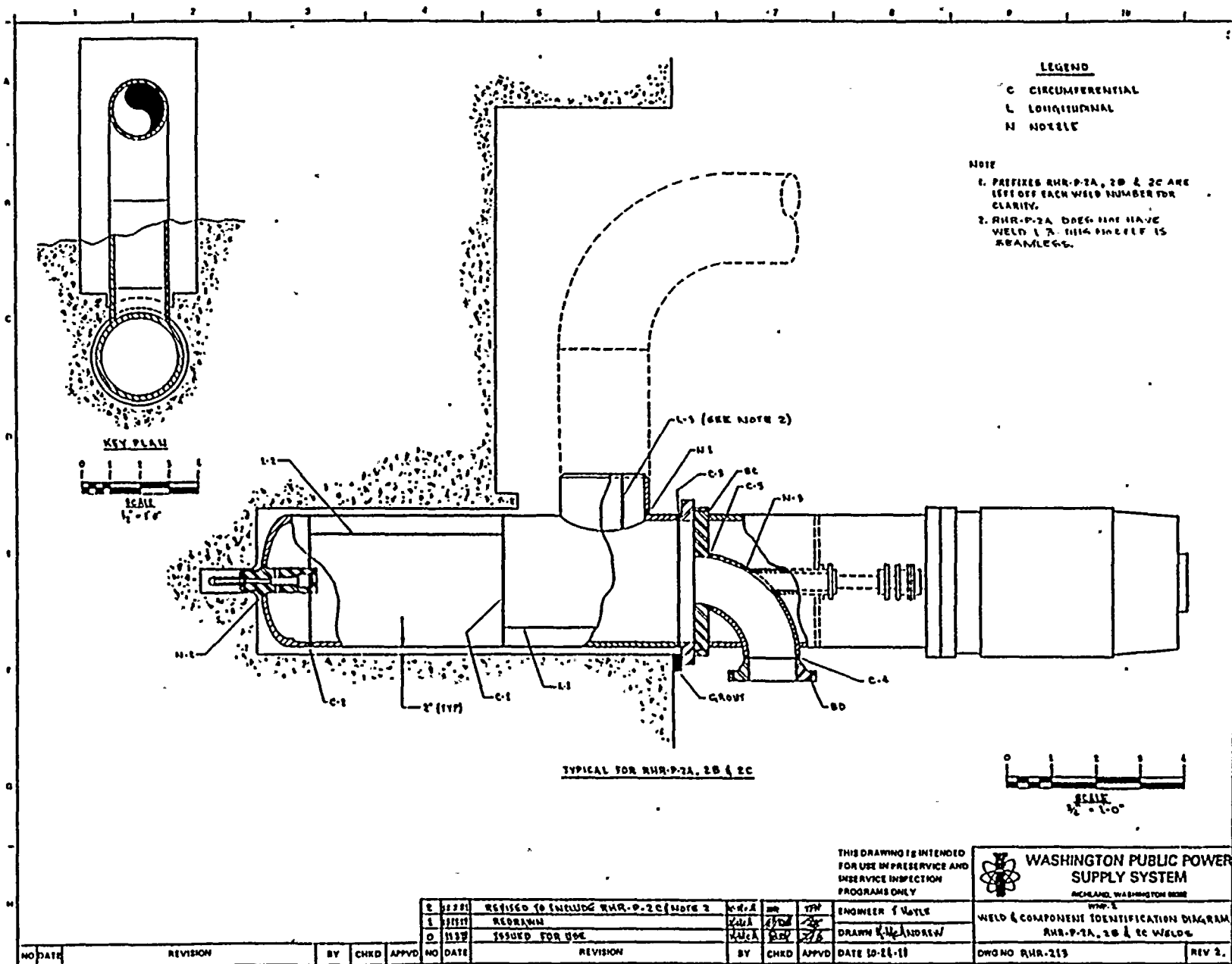


FIGURE 3

WNP-2
Interval 2
HPCS - High Pressure Core Spray

Table 9.1.4
Washington Public Power Supply System
ISI Program Plan and Schedule
(Grouped by Drawing No. and Walkdown Order)

Revision 1

Pg	Identification No.	Description	Category	Item No.	Method	Per.	Out.	Reqmnt.	Code	Out. Freq.	Rel. Req.	Remarks
Diagram No. HPCS-206												
01	HPCS-P-1C-1	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1C-2	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1C-3	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1C-4	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1C-5	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1C-6	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1C-7	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1N-1	PMP NOZZLE WELD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1N-2	PMP NOZZLE WELD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1N-3	PMP NOZZLE WELD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1L-1	PMPCAS/LONG WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1L-2	PMPCAS/LONG WLD	C-G	C6.10	SUR				C	0	15	
	HPCS-P-1L-3	PMPCAS/LONG WLD.	C-G	C6.10	SUR				C	0	15	

WNP-2
Interval 2
LPCS - Low Pressure Core Spray

Table 9.1.4
Washington Public Power Supply System
ISI Program Plan and Schedule
(Grouped by Drawing No. and Walkdown Order)

Revision 1

Pg	Identification No.	Description	Category	Item No.	Method	Per.	Out.	Reqmt.	Code	Out. Freq.	Rel. Req.	Remarks
Diagram No. LPCS-208												
01	LPCS-P-1C-1	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1C-2	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1C-3	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1C-4	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1C-5	PMP CAS/CIR WLD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1N-1	PMP NOZZLE WELD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1N-2	PMP NOZZLE WELD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1N-3	PMP NOZZLE WELD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1L-1	PMPCAS/LONG WLD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1L-2	PMPCAS/LONG WLD	C-G	C6.10	SUR				C	0	15	
	LPCS-P-1L-3	PMPCAS/LONG WLD	C-G	C6.10	SUR				C	0	15	

WNP-2
Interval 2
RHR - Residual Heat Removal

Table 9.1.4
Washington Public Power Supply System
ISI Program Plan and Schedule
(Grouped by Drawing No. and Walkdown Order)

Revision 1

Pg	Identification No.	Description	Category	Item No.	Method	Per.	Out.	Reqmnt.	Code	Out. Freq.	Rel. Req.	Remarks
Diagram No. RHR-213												
	RHR-P-2AC-1	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AC-2	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AC-3	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AC-4	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AC-5	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AN-1	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AN-2	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AN-3	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AL-1	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2AL-2	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2A(CS)	RHR PUMP BASE	F-A	F1.40A	VT-3	1	10	41	CE	10		
	RHR-P-2BC-1	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BC-2	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BC-3	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BC-4	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BC-5	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	

WNP-2
Interval 2
RHR - Residual Heat Removal

Table 9.1.4
Washington Public Power Supply System
ISI Program Plan and Schedule
(Grouped by Drawing No. and Walkdown Order)

Revision 1

Pg	Identification No.	Description	Category	Item No.	Method	Per.	Out.	Requmt.	Code	Out. Freq.	Rel. Req.	Remarks
Diagram No. RHR-213												
	RHR-P-2BN-1	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BN-2	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BN-3	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BL-1	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BL-2	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2BL-3	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2B(CS)	RHR PUMP BASE	F-A	F1.40A	VT-3	1	10	41	CE	10		
	RHR-P-2CC-1	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CC-2	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CC-3	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CC-4	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CC-5	PMP CAS/CIR WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CN-1	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CN-2	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CN-3	PMP NOZZLE WELD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CL-1	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CL-2	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2CL-3	PMPCAS/LONG.WLD	C-G	C6.10	SUR			Z	C	0	15	
	RHR-P-2C(CS)	RHR PUMP BASE	F-A	F1.40A	VT-3	1	10	41	CE	10		
	RHR-PB-213(L)	LK PRES BNDRY	C-H	C7.50	VT-2	1	13	P	CE	3		
	RHR-PB-213(H)	HYDRO PRES BNDR	C-H	C7.60	VT-2	3	19	E	CE	10		

