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SUBJECT: Forwards second 10-Yr ISI program plan relief request for exam category B-F.

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December 13, 1995
GO2-95-271

Docket No. 50-397

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 B-F

References: 1) Letter GO2-94-286, dated December 27, 1994, JV Parrish (SS) to NRC, "Second 10-Year Inservice Inspection Program Plan"

2) Letter GO2-95-175, dated September 12, 1995, JV Parrish (SS) to NRC, "Inservice Inspection Summary Report for Tenth Refueling Outage"

Reference 1 submitted the second 10-year inservice inspection program plan. Reference 2 identified 2 welds where ASME Section XI requirements could not be met. The reference committed to submitting relief requests for these two welds. Per discussion with staff, a determination was made that a relief request was required only for the weld in Examination Category B-F. Therefore, in accordance with 10 CFR 50.55a(g)(6)(i), the Supply System requests approval of relief request 2ISI-17 for relief from 100% examination of Category B-F nozzle-to-safe-end welds. Details are included in Attachment 1.

Review and approval of this relief request is requested prior to April 1, 1996.

A047

SECOND 10-YEAR INSERVICE INSPECTION PROGRAM PLAN RELIEF REQUEST FOR EXAMINATION CATEGORY B-F

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

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
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JW Clifford - NRC
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NRC Sr. Resident Inspector - 927N

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-17

Welds for Which Relief is Requested

ASME Section XI, 1989 Edition, no Addenda, Table IWB-2500, Examination Category B-F, Item Number B5.10 welds listed below.

Table I: Examination Category B-F Welds and Examination Volume Coverage

ISI Identification No.	Description	Diagram No.	Pg	% Code Volume Examined
10HPCS(1)-4	SE to Nozzle	HPCS-101	02	>80
10LPCS(1)-4	SE to Nozzle	LPCS-101	02	>75
12LPCI(1)A-6	SE to Nozzle	RHR-101	--	>80
12LPCI(1)B-6	SE to Nozzle	RHR-102	--	>80
12LPCI(1)C-6	SE to Nozzle	RHR-103	--	>80
12RFW(1)AA-11	SE to Nozzle	RFW-101	03	>90
12RFW(1)AB-11	SE to Nozzle	RFW-101	04	>80
12RFW(1)AC-13	SE to Nozzle	RFW-101	05	>80
12RFW(1)BD-11	SE to Nozzle	RFW-102	03	>90
12RFW(1)BE-11	SE to Nozzle	RFW-102	04	>80
12RFW(1)BF-14	SE to Nozzle	RFW-102	05	>80
12RRC(1)-N2A-6	SE to Nozzle	RRC-101	08	>80
12RRC(1)-N2B-6	SE to Nozzle	RRC-101	07	>80
12RRC(1)-N2C-6	SE to Nozzle	RRC-101	06	>80
12RRC(1)-N2D-6	SE to Nozzle	RRC-101	05	>80
12RRC(1)-N2E-6	SE to Nozzle	RRC-101	04	>80
12RRC(1)-N2F-6	SE to Nozzle	RRC-102	08	>80
12RRC(1)-N2G-6	SE to Nozzle	RRC-102	07	>80
12RRC(1)-N2H-6	SE to Nozzle	RRC-102	06	>80
12RRC(1)-N2J-6	SE to Nozzle	RRC-102	05	>80
12RRC(1)-N2K-6	SE to Nozzle	RRC-102	04	>80
24RRC(2)A-1	SE to Nozzle	RRC-101	01	>80
24RRC(2)B-1	SE to Nozzle	RRC-102	01	>80
4JP(NZ)A-1	SE to Nozzle	RPV-101	--	>90
4JP(NZ)B-1	SE to Nozzle	RPV-101	--	>90

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-17

ASME Section XI Requirements

ASME Section XI, 1989 Edition, no Addenda, Table IWB-2500-1, Examination Category B-F, item B5.10 requires a volumetric examination of the weld and adjacent base metal as defined in Figure IWB-2500-8.

Appendix III, III-4420 requires examination volume to be covered in two-beam path directions.

Code Requirement from Which Relief is Requested

Relief is requested from performing a volumetric examination in two-beam path directions per paragraph III-4420 of 100% of the examination volume defined in Figure IWB-2500-8 for the welds listed in Table I above.

Basis for Relief

Design of the nozzle-to-safe-end welds preclude obtaining two-beam path direction for 100% of the examination volume of the welds listed in Table I. Examination of these welds is performed using a 45-degree shear wave for the safe-end portion of the weld and 45 and 60-degree refracted longitudinal (RL) wave transducers for the inconel portion of the weld. Due to the configuration of the nozzle taper 100% coverage of examination volume is not possible in the beam direction looking away from the nozzle for the 45 and 60-degree RL transducers (see Figure 1).

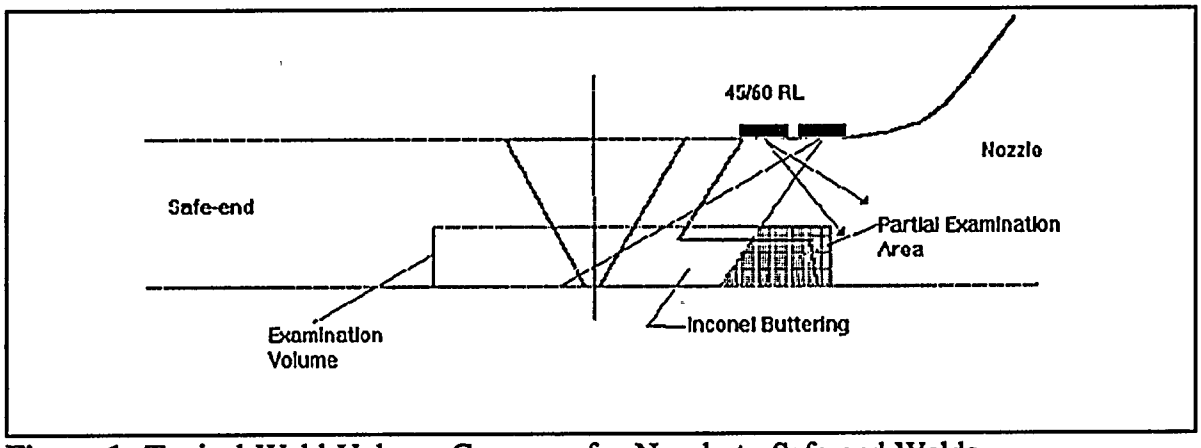

Figure 1: Typical Weld Volume Coverage for Nozzle-to-Safe-end Welds

ATTACHMENT 1

RELIEF REQUEST NO. 2ISI-17

Alternative Examinations

Perform the examinations required by ASME Section XI, Appendix III, III-4420 to the maximum extent allowed by the nozzle-to-safe-end configuration using 45-degree shear, 45-degree refracted longitudinal (RL), and 60-degree RL wave transducers. The extent of the examination volume coverage is defined in Table I.

Justification for the Granting of Relief

There will be no adverse impact on plant quality and safety by doing only a partial Code examination of these welds for the following reasons:

1. The Code examinations are being supplemented by the technique suggested in Information Notice 90-30[1], General Electric (GE) Service Information Letters (SIL) 455 Revision 1[2], and 455 Revision 1 Supplement 1[3] using 45 and 60-degree refracted longitudinal wave transducers. The examination of the safe-end side of the weld is accomplished by the 45-degree shear wave technique and 100% coverage of this examination volume is obtained. The inconel portion of the weld is examined with a 45-degree RL wave supplemented by a 60-degree RL wave.

2. No unacceptable indications were found during the first inservice inspection interval examinations[4] using the techniques described in GE SIL 455 and NRC IN 90-30.

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1 NRC Information Notice No. 90-30, "Ultrasonic Inspection Techniques for Dissimilar Metal Welds", May 1, 1990

2 GE SIL No. 455 Revision 1, "ISI of Additional Alloy 182 Weldments", February 22, 1988

3 GE SIL No. 455 Revision 1 Supplement 1, "ISI of Additional Alloy 182 Weldments", June 23, 1989

4 ISI Summary Reports for Refueling Outages RF92A and RF94A, pg 6

3. The identified welds will be subject to a system pressure test in accordance with ASME Section XI Examination Category B-P requirements[5].

4. Leak detection systems identify significant leakage in the areas of the subject welds[6]. Appropriate operator action would occur due to leak detection system alarms[7].

5. The percent of achievable examination volume is significant and representative of the item B5.10 welds. Nozzle-to-safe-end weld integrity will be ensured by completing the percent of the welds' examination volume defined in Table I.

Implementation Schedule

This relief request applies to the entire second inspection interval.

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5 ISI Program Plan Second Interval pg 5-67

6 WNP-2 Final Safety Analysis Report, Amendment No. 36, page 5.2-36, dated December, 1985

7 PPM 4.3.1.2 "High Unidentified Reactor Leakage in Primary Containment"