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SUBJECT: Advises that QA manual,App B program being modified to incorporate Code Cases N-460 & N-498 re alternative exam coverage for Class 1 & 2 welds & alternate rules for 10-yr hydrostatic pressure testing,respectively.

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January 5, 1993

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Quality Assurance Manual Revision, Appendix B
Ginna Nuclear Power Plant Inservice Inspection
ASME Section XI Required Examinations
R. E. Ginna Nuclear Power Plant
Docket No. 50-244

Ref.(a): Code Case N-460, "Alternative Examination Coverage for Class 1&2 Welds, Section XI, Division 1"

(b): Code Case N-498, "Alternate Rules for 10 Year Hydrostatic Pressure Testing for Class 1&2 Systems"

Dear Mr. Johnson:

The purpose of this letter is to notify your office that the Rochester Gas and Electric Quality Assurance Manual, Appendix B Program is being modified to incorporate Code Cases N-460 and N-498 (References a and b above). Both Code Cases have been approved for use as specified in Regulatory Guide 1.147, Revision 9, dated April 1992. Also, RG&E requests relief from a provision of Code Case N-460, as described in Attachment 1.

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 reduction in coverage is less than 10%. Code Case N-498 states that alternative rules may be used in lieu of those required by Section XI, Division 1, Table IWB-2500-1, Category B-P, and Table IWC-2500-1, Category C-H, for the 10 year hydrostatic pressure test.

The Relief Request, No. 19, described in Attachment 1 is required because, due to the closeness of three (3) nozzles and the pulsation dampener vessel support locations, interferences exist which prevent obtaining the required 90% volume coverage.

Very truly yours,

Robert C. Mecredy

Robert C. Mecredy

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Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

US NRC Ginna Senior Resident Inspector

ATTACHMENT I

RELIEF REQUEST NO. 19

I. Component for Which Relief is Requested:

Charging System, Class 2 Pulsation Dampener nozzle inside radius and nozzle welds examination volumes per Category C-B, Items C2.21 and C2.22.

II. ASME Requirement for Which Relief is Requested:

Within Table IWC-2500-1, Category C-B provides examination requirements for Class 2 pressure retaining nozzle welds in vessels. The Pulsation Dampener contains three (3) nozzles, in line, located at the bottom of the unit. These nozzles require both surface and volumetric examinations as specified by Item C2.21 for nozzle-to-shell welds. The same three (3) nozzles also require volumetric examination as identified by Item C2.22 for the nozzle inside radius sections. ASME Section XI requires "essentially 100% of the weld length" as specified within the notes within the IWC-2500-1 tables. ASME Section XI Code Case N-460, approved 27 July 1988, provides clarification for Class 1 and 2 examination volume of welds due to interference by another component or part geometry. 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 reduction is less than 10%.

The R. E. Ginna Nuclear Power Plant was constructed to B31.1, 1955 edition. This Code did not contain requirements to ensure that items be accessible for future examinations. The Pulsation Dampener was constructed and installed in the early 1970's, and the construction code did not provide provisions for accessibility for ISI NDE.

The three (3) nozzles that require examination are identified as CF-N1, CF-N2 and CF-N3. The outboard nozzle is identified as CF-N1. Between this nozzle and the middle nozzle (identified as CF-N2) is a support that covers the edge of one nozzle weld heat affected zone to the edge of the other nozzle weld heat affected zone. From the middle nozzle to the third nozzle (identified as CF-N3) is a space of only 7/8" from the edge of the other nozzle heat affected zone. Due to the identified interferences of the nozzles and the vessel support, the associated volumetric and surface volume coverage acceptance criteria is below the stated value within Code Case N-460. The following table summarizes the maximum coverage obtained when using the indicated examination methods.

Nozzle Weld	NDE Method	% of Coverage
CF-N1	PT	66%
	UT	65%
CF-N2	PT	66%
	UT	65%
CF-N3	PT	>90%
	UT	80%

Since the original construction code did not specify accessibility requirements for future ISI NDE, the identified volume coverage should be considered acceptable in meeting code requirements. The proposed alternate method is described below.

III. Proposed Alternate Method:

Rochester Gas and Electric (RG&E) proposes that the NDE volume coverage identified within the table above be acceptable in fulfilling the Code required examinations. The actual physical configuration on the component being examined is not conducive to meeting the requirements specified within Code Case N-460.

In addition, RG&E proposes to perform a VT-2 visual examination on the entire Pulsation Dampener during a leakage test and hydrostatic pressure test in accordance with IWA-5000 and Table IWC-2500-1.