

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION UNIT 1

FIRST INTERVAL INSPECTION RELIEF REQUEST SUMMARY

<u>NUMBER</u>	<u>CODE ADDENDA</u>	<u>CATEGORY</u>	<u>DESCRIPTION</u>	<u>QUANTITY</u>	<u>REQUIRED METHOD</u>	<u>BASIS</u>
1IIRR1	S'75	B-D	RPV Nozzle	22 of 41	Vol.	Design
1IIRR2	S'75	B-O	CRD Housing	4 of 4	Vol.	Design
1IIRR3	S'75	B-L-1	Pump Welds	1 of 1	Vol.	Material, Geometry
1IIRR4A	S'75	B-M-2	Valve Bodies	1 of 10	Vis. and IWA-6000	Documentation
1IIRR4B	S'75	B-M-2	Valve Bodies	1 of 10	Vis.	Alternate UT
1IIRR5	W'81	B-K-1	Welded Support Attachments	9 of 69	Surf.	Design
1IIRR6	W'81	B-F	Dissimilar Welds	1 of 62	Vol. and Surf.	Material, Geometry
1IIRR7	W'81	B-J	Piping Welds	2 of 179	Vol. and Surf.	Design
1IIRR8A	S'75	C-A	FW Vessel Welds	2 of 4	Vol.	Design, Geometry
1IIRR8B	S'75	C-B	FW Nozzle Welds	4 of 8	Vol.	Design, Geometry
1IIRR9	W'81	C-F	Piping Welds	24 of 190	Vol, Surf. /Surf.	Design, Geometry Material
1IIRR10	S'75	C-F	CS Pump Welds	All	Vol.	Design, Geometry
1IIRR11	W'81	Class 1 Augmented	Non-Conforming Sensitive Piping	64 of 275	Vol. and Surf.	Design, Geometry Material
1IIRR12	W'81	Class 2 Augmented	Non-Conforming Sensitive Piping	7 of 66	Vol. and Surf.	Design, Geometry Material

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NIAGRA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION UNIT 1

FIRST INTERVAL INSPECTION RELIEF REQUEST SUMMARY

CONTINUED

<u>NUMBER</u>	<u>CODE ADDENDA</u>	<u>CATEGORY</u>	<u>DESCRIPTION</u>	<u>QUANTITY</u>	<u>REQUIRED METHOD</u>	<u>BASIS</u>
1IIRR13	S75	IWA-5000	CLC, CST, SW	Not Applicable	Vis.	Nonisolatable
1IIRR14	S75	IWA-5000	FPC	Not Applicable	Vis.	Filter Overpressurization
1IIRR15	S75	IWA-5000	MS	Not Applicable	Vis.	Valve Seal Design
1IIRR16	S75	IWA-5000	CRD	Not Applicable	Vis.	Nonisolatable
1IIRR17	S75	B-H	RPV SKIRT	1	Vol.	Design, Geometry
PSIRR1	W81	B-F & B-J	PIPING WELDS	8 of 22	Vol. & Surf.	Design, Geometry, & Material
PSIRR2	W81	B-J	PIPING WELDS	25 of 25	Vol. & Surf.	Design, Geometry, & Material

NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR1

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel
Quality Group: A
Component Description: Vessel-to-Nozzle Weld and Inner Radius

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

Class 1, Category B-D, Item B1.4 requires a volumetric examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric examination for twenty-two (22) of the required forty-one (41) Category B-D nozzles.

4. BASIS FOR RELIEF

The nozzle sections listed on the attached were not fully inspected ultrasonically due to limitations of design. Access to perform nozzle examinations was not provided for in the original design. The vessel's permanent mirror insulation and clearance of seven inches to the biological shield wall prevented inspection. Movable sections in the insulation were subsequently installed. The access opening through the movable doors of the biological shield and through the permanent insulation restrict full coverage of the code required volume (CRV). Extremely long ultrasonic scan paths are required due to the large thickness of the vessel wall and nozzle barrel. Also, the vessel drain nozzle RV-1-568-25 is completely obstructed due to proximity of the Control Rod Drive and In-Core Flux Monitor penetrations. In the 1980 and later editions of Section XI Code, this nozzle is specifically exempted.

The percentage of CRV that was completely examined is tabulated on the attached, first for the inner radius (r) section and next for the weld (w) section of the obstructed nozzles. This percentage of examination coverage was determined by averaging the coverage of each scan of the required volume from both sides for the weld (w) and by using a weighted average of such coverage for the inner radius (r) adjacent volume.

5. ALTERNATE EXAMINATION

In order to augment the partially performed Section XI Code examination, a surface examination of the inside nozzle bore and adjacent radius section was performed in accordance with NUREG 0619. The nozzles so examined are RV-4-566 (A,B,C & D) and RV-6-567. In accordance with prior Relief Requests 1 and 2, a remote visual examination was performed on inside vessel cladding made accessible by removal of certain vessel internals. This examination included clad overlay on nozzle welds and radius sections.

Radiography of the partially inspected nozzles would not yield meaningful inservice evaluation of weld or radius metal without multiple long exposures involving a number of different film types and speeds. This is due to the geometric configuration of the inside right angle surfaces, and of massive wall thickness of the vessel and nozzle barrel. Both inside and outside surfaces would have to be made accessible. High radiation fields would necessitate prohibitively long exposures even with an 'extremely' active radiographic source. Surface examination of the nozzle outside surface would not safely detect cracks which operating experience has shown to originate on the inside surface of those nozzles subject to cyclic thermal stresses. Radiographic or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of nozzle weld or barrel integrity and plant safety.

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of nozzle weld and barrel integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



FIRST INTERVAL INSPECTION

REQUEST FOR RELIEF IIR1

CATEGORY B-D S75

Page 3

<u>EXAMINATION AREA</u>	<u>NOZZLE DESCRIPTION</u>	<u>CRV EXAMINED</u>	<u>LIMITATION</u>
RV-1-565A (-r,-w)	RR Inlet	60%, None	Bottom Head Taper of Shell Thickness
RV-1-565B (-r,-w)	RR Inlet	60%, None	Bottom Head Taper of Shell Thickness
RV-1-565C (-r,-w)	RR Inlet	60%, None	Bottom Head Taper of Shell Thickness
RV-1-565D (-r,-w)	RR Inlet	60%, None	Bottom Head Taper of Shell Thickness
RV-1-565E (-r,-w)	RR Inlet	60%, None	Bottom Head Taper of Shell Thickness
RV-1-568-25 (-r,-w)	RPV Drain	None, None	CRD & FM Housings & Penetrations
RV-2-566A (-r,-w)	EC	55%, 65%	Adjacent Nozzle, Non-Movable Bioshield
RV-2-566B (-r,-w)	EC	75%, 73%	Adjacent Nozzle, Non-Movable Bioshield
RV-2-567A (-r,-w)	CS	66%, 66%	Adjacent Nozzle, Non-Movable Bioshield
RV-2-567B (-r,-w)	CS	54%, 56%	Adjacent Nozzle, Non-Movable Bioshield
RV-3-565A (-r,-w)	RR Outlet	73%, 65%	Lug, Adjacent Nozzle, Non-Movable Bioshield
RV-3-565B (-r,-w)	RR Outlet	73%, 65%	Non-Movable Bioshield
RV-3-565C (-r,-w)	RR Outlet	73%, 65%	Lug, Adjacent Nozzle, Non-Movable Bioshield
RV-3-565D (-r,-w)	RR Outlet	73%, 65%	Non-Movable Bioshield
RV-3-565E (-r,-w)	RR Outlet	73%, 63%	Lug, Thermocouple, Non-Movable Bioshield
RV-4-566A (-r,-w)	FW	82%, 94%	Adjacent Nozzle, Non-Movable Bioshield
RV-4-566B (-r,-w)	FW	47%, 78%	Adjacent Nozzle, Non-Movable Bioshield
RV-4-566C (-r,-w)	FW	84%, 86%	Adjacent Nozzle, Non-Movable Bioshield
RV-4-566D (-r,-w)	FW	59%, 85%	Non-Movable Bioshield
RV-6-566A (-r,-w)	MS	54%, 87%	Adjacent Nozzle, Non-Movable Bioshield
RV-6-566B (-r,-w)	MS	79%, 91%	Adjacent Nozzle, Non-Movable Bioshield
RV-6-567 (-r,-w)	CRD Return	48%, 63%	Non-Movable Bioshield

NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR2

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel
Quality Group: A
Component Description: Control Rod Drive Housing Welds

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

Class 1, Category B-O, Item B1.18 requires a volumetric examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric examination of all welds in 10% (equal to four (4)) of the peripheral control rod drive housings.

4. BASIS FOR RELIEF

The listed welds were not fully inspected ultrasonically due to limitations of design.

The coverage of each of the four (4) ultrasonically examined control rod drive housing welds is estimated to be 50% of the Code Required Volume. The housing welds which were partially ultrasonically examined are:

RV-CRD-R1 (38-47)
RV-CRD-S1 (26-51)
RV-CRD-T3 (50-23)
RV-CRD-U2 (50-35)

A sector of approximately 180° of each housing circumference is obstructed by adjacent housings and their hydraulic lines.

5. ALTERNATE EXAMINATION

Surface and radiographic examination as an alternate method is not possible on those same portions which were not accessible to ultrasonic examination. Radiographic or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of control rod drive housing weld integrity or plant safety.

NMP1, First Interval Inspection Relief Request 1IIRR2
Category B-0
Page 2

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of Control Rod Drive Housing Weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

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1. COMPONENT IDENTIFICATION

System: Reactor Recirculation
Quality Group: A
Component Description: Pump Casing Welds (suction elbow casing to pump casing)

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

Class 1, Category B-L-1, Item B5.6 requires a volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of the pump casing welds of the suction elbow-to-pump in at least one (1) of the reactor recirculation pumps.

4. RELIEF REQUESTED

The geometric configuration of the weld joint, the cast metal of the pump impeller casing and the cast stainless steel of the pump casing elbow preclude meaningful evaluation of ultrasonic examination of this weld.

5. ALTERNATE EXAMINATION

For reactor recirculation pump casing welds 32-SW-11S-0 and 32-SW-15S-9 and alternate liquid penetrant examination was performed. Visual examination of internal pressure boundary surfaces was performed on all five (5) pump casings.

Radiography of pump casing welds would not result in a meaningful examination. Multiple exposures involving multiple film types and speeds would be required due to the complex outside surface at one side (pump side) of the weld, single bevel on the other (casing elbow) side's outside surface, and massive, varying wall thickness. Radiographic examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of pump casing integrity or plant safety.

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NMP1, First Interval Inspection Relief Request 1IIRR3
Category B-L-1
Page 2

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of pump casing pressure boundary integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR4A

1. COMPONENT IDENTIFICATION

System: Main Steam
Quality Group: A
Component Description: Valve Internal Pressure Retaining Surfaces

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

Class 1, Category B-M-2, Item B6.7 requires a visual examination.

3. RELIEF REQUESTED

Relief is requested from visual examination of the internal pressure boundary surfaces of one valve in each group of valves. Relief is requested from the requirements to examine valve bodies by qualified examiners per section XI Subarticle IWA-2300 and to document results and evaluations in accordance with Section XI Article IWA-6000. The Class 1 valves larger than four inch (4") nominal pipe size were grouped by constructional design (type), manufacturer and function in the system. Relief is herein requested for one (1) of the required ten (10) examinations as follows:

Group 9 Reactor Vessel Head Safety Valves

Group 2 is addressed in a separate relief request.

4. BASIS FOR RELIEF

Group 9 received maintenance inspections by the Owner's quality control personnel. Other maintenance inspections were performed when all Group 9 valves were refurbished. Fifty percent of the valves are rotated out of service and are replaced by spares each refueling outage. All were sent off site each outage for refurbishing and testing prior to being returned to service or placed in storage as spares. Relief is requested from the examiner qualification and certification requirements of Section XI Subarticle IWA-2300 and documentation requirements of Article IWA-6000. Documentation, inspector certification of training and qualification, specific visual findings of valve body and other internal pressure retaining surfaces, and evaluation of results are not in place. Visual inspection similar to that required is directly evidenced by selective replacement, repair or adjustment of parts and indirectly by accomplishment of pressure and operability tests conducted offsite.

NMP1, First Interval Inspection Relief Request 1IIRR4A
Category B-M-2
Page 2

5. ALTERNATE EXAMINATION

No alternate examinations were performed on Group 9 valves. Baseline thickness measurements had been performed at the start of the first inspection interval for twenty-five (25) Category B-M-2 valves whose groups did not require relief.

6. PLANT QUALITY AND SAFETY

The other Main Steam Isolation Valve Group, Group 1, did receive the required visual examination. The examinations as performed, together with the completed, required leakage, hydrostatic, and other pressure tests (as applicable) provide an acceptable level of assurance of valve pressure retaining integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

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THE UNITED STATES OF AMERICA

IN SENATE

January 1, 1900

REPORT

OF

THE SECRETARY OF THE INTERIOR

NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR4B

1. COMPONENT IDENTIFICATION

System: Main Steam
Quality Group: A
Component Description: Valve Internal Pressure Retaining Surfaces

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

Class 1, Category B-M-2, Item B6.7 requires a visual examination.

3. RELIEF REQUESTED

Relief is requested from visual examination of the internal pressure boundary surfaces of one valve in each group of valves. The Class 1 valves larger than four inch (4") nominal pipe size were grouped by constructional design (type), manufacturer and function in the system. Relief is herein requested for one (1) of the required ten (10) examinations as follows:

Group 2 Main Steam Blocking.

Group 9 is addressed on a separate relief request.

4. BASIS FOR RELIEF

Relief is requested from the Category B-M-2 requirements for Group 2 valves. As an alternate examination not involving disassembly of the valve, ultrasonic thickness measurements were recorded for Group 2 Valve 01-07 at the conclusion of the first inspection interval. At the start of the first inspection interval, baseline ultrasonic measurements on this valve had been performed.

5. ALTERNATE EXAMINATION

Alternate ultrasonic thickness measurements were conducted as discussed above, for Valve Group 2 for which no inspection of internal surfaces was done. Also, baseline thickness measurements had been performed at the start of the first inspection interval for four Group 2 valves and twenty-five (25) other Category B-M-2 valve whose groups did not require relief.

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NMP1, First Interval Inspection Relief 1IIRR4B
Category B-M-2
Page 2

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required leakage, hydrostatic, and other pressure tests (as applicable), provide an acceptable level of assurance of valve pressure retaining integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR5

1. COMPONENT IDENTIFICATION

System: Various
Quality Group: A
Component Description: Integrally Welded Support Attachments

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1980 Edition with Addenda through Winter 1981

Class 1, Category B-K-1, Item B10.10, B10.30 require a surface examination.

3. RELIEF REQUESTED

Relief is requested from the requirement to examine by surface method all integrally welded support attachments of piping, pumps, and valves. Relief is requested for nine (9) welded support attachment areas which did not receive full surface examination, out of the total sixty-nine (69) required areas.

4. BASIS FOR RELIEF

The supports listed on the attached were not fully inspected due to limitations of design. The integrally welded support attachment lugs on piping in systems other than Reactor Recirculation are fillet welded to the piping. Hanger pipe clamp contacts and thus obstructs one edge of the attachment lug on four (4) supports. The structural steel members of five (5) valve supports completely obstruct physical access to examine their welded attachments by volumetric or surface methods. The percentage of Code Required Area (CRA) that was examined by surface method is tabulated for each obstructed support.

5. ALTERNATE EXAMINATION

No alternate examinations were performed. Should supports for which relief is requested be dismantled for maintenance or for piping replacement in the second inspection interval, the required examination of their welded attachment would be performed then.

To perform the required surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of integrally welded attachment or pressure boundary integrity, or plant safety.



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NMPl, First Interval Inspection Relief Request 1IIRRS
Category B-K-1
Page 2

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required leakage, hydrostatic, and other pressure tests (as required), provide an acceptable level of assurance of integrity of integrally welded attachment and pressure retaining boundary.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

FIRST INTERVAL INSPECTION

REQUEST FOR RELIEF 1IIRRS

CATEGORY B-K-1 W'81

Page 3

CODE CATEGORY ITEM #	EXAMINATION AREA	DESCRIPTION	% CRA EXAMINED	LIMITATION
810.10	<u>Feedwater</u>			
	31-H10	Pipe Support, Welded, 4 Lugs	90%	Pipe clamp contacts one side of lug, weld lacks surface preparation. Pipe clamp contacts one side of lug, weld lacks surface preparation. Pipe clamp contacts one side of lug, weld lacks surface preparation. Pipe clamp contacts one side of lug, weld lacks surface preparation.
	31-H12	Pipe Support, Welded, 4 Lugs	90%	
	31-H5	Pipe Support, Welded, 4 Lugs	90%	
	31-H7	Pipe Support, Welded, 4 Lugs	90%	
810.30	<u>Shutdown Cooling</u>			
	38-A1	Valve 38-02 Support, Welded, Bracket	None	Permanent structural steel members of the support totally obstruct access
810.30	<u>Core Spray</u>			
	40-A1	Valve 40-02 Support, Welded, Bracket	None	Permanent structural steel members of the support totally obstruct access
	40-A2	Valve 40-12 Support, Welded, Bracket	None	Permanent structural steel members of the support totally obstruct access
810.30	<u>Reactor Water Cleanup</u>			
	33-A2	Valve 33-03 Support, Welded, Bracket	None	Permanent structural steel members of the support totally obstruct access
	33-A3	Valve 33-04 Support, Welded, Bracket	None	Permanent structural steel members of the support totally obstruct access

NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR6

1. COMPONENT IDENTIFICATION

System: Reactor Cleanup

Quality Group: A

Component Description: Pressure Retaining Dissimilar Metal Welds

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1980 Edition with Addenda through Winter 1981

Class 1, Category B-F, Item BS.130 requires a surface and a volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric and surface examination of pressure retaining dissimilar metal welds. Relief is requested for one (1) of the sixty-two (62) required welds.

4. BASIS FOR RELIEF

The weld 33-FW-RCU-10-2A (Elbow to Pipe) was not inspected due to limitations of design. This weld is inaccessible inside a containment penetration.

5. ALTERNATE EXAMINATION

No alternate examination was performed. There is no access to perform an alternate examination of the weld inside the containment penetration sleeve. Radiographic examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of dissimilar weld integrity or plant safety.

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6. PLANT QUALITY AND SAFETY

Thirty one (31) reactor vessel safe-ends were replaced on the first inspection interval. Augmented ultrasonic and surface examinations were performed as appropriate on other piping-to-vessel safe-end dissimilar metal welds in addition to required inservice inspections which were performed. Also, the nozzle NSA safe-end of 39-FW-25 and 39-FW-25A and the nozzle NSB safe-end of 39-FW-EC1 and 39-FW-EC2 were examined with liquid penetrant on the inside and outside surfaces at the time of piping replacement. The feedwater nozzle safe-ends were examined with liquid penetrant on the inside surface in accordance with NUREG-0619. The required leakage, hydrostatic and other pressure tests (as applicable) were conducted. The examinations as performed provide an acceptable level of assurance of dissimilar weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

1. 凡在本市范围内从事生产、经营活动的单位和个人，均须依法纳税。

2. 纳税人必须按照规定的期限缴纳税款，不得逾期。

First Interval Inspection

1. COMPONENT IDENTIFICATION

Quality Group: A

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

Class 1, Category B-J, Items B9.10, B9.20, B9.30 require a surface and a volumetric examination

Relief is requested from the requirement to examine by both volumetric and surface methods the piping welds in the reactor coolant pressure boundary. Relief is requested for two (2) of the required one hundred and seventy-nine (179) welds. This does not include numerous class 1 piping welds that were scheduled earlier in the first inspection interval and which were partially examined volumetrically.

The welds listed on the attached were not fully inspected volumetrically due to limitations of design, geometry, and material of construction. The dendritic structure of those welds which are made of stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In general both the geometry of non-parallel surfaces and the product form of the material of valves preclude meaningful ultrasonic examination from the valve side. Two (2) welds were limited in ultrasonic examination by fitting component configuration.

-19-

5. ALTERNATE EXAMINATION

No alternate examinations were performed. The required surface examination was performed on all welds. Radiography did not yield results with meaningful evaluation for Reactor Recirculation valves and branch connection fillet welds, due to fitting thickness and weld geometries.

Radiography of fitting welds would not result in a meaningful examination, due to component configuration and double wall elliptical exposures necessitated from the outside surfaces. Multiple exposures would be necessary for complete coverage and would compound difficulties in evaluating results. Volumetric or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of piping weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

Class 1 piping welds in addition to the minimum required by Section XI were examined. Six were regularly scheduled in the current first interval inservice inspection program plan beyond the minimum number required, and were partially examined volumetrically. Moreover, other welds, which had been partially examined volumetrically in the first or second inspection periods, were not counted towards the required total; these were subsequently removed from the first interval program and replaced with others.

Class 1 piping welds were examined in addition to those scheduled per Section XI requirements. Two hundred and eighty-one were to be inspected per the augmented program.

Class 1 piping welds were examined in addition to scheduled Section XI and augmented examination. Thirty three were fully examined without limitations, four were partially examined due to ultrasonic limitations, and two examined with liquid penetrant only. All of these were welds in the replacement piping of the reactor recirculation system. Their ultrasonic examination was performed using either the Smart Ultrasonic, Ultra Image III, or Ultrasonic Data Recording and Processing automated systems.

The examinations as performed, together with the completed, required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



FIRST INSPECTION INTERVAL

REQUEST FOR RELIEF 1IIRR7

CATEGORY B-J

Page 3

CODE CATEGORY ITEM #	SYSTEM	EXAMINATION AREA	DESCRIPTION	REQUIRED METHOD	EXTENT EXAMINED	LIMITATION
B9.11	CS	40-FW-25	Pipe to Valve 40-09	UT PT	58% CRV	Fitting Configuration
B9.11	CS	40-FW-17	Pipe to Valve 40-12	UT PT	58% CRV	Fitting Configuration

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NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR8A

1. COMPONENT IDENTIFICATION

System: Feedwater
Quality Group: B
Component Description: Pressure Retaining Welds in Vessels

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975.

Class 2, Category C-A, Item C1.1 requires volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of vessel circumferential welds at structural discontinuities of one of similar pressure vessels in multiple loops. Relief is requested for two (2) of the four required vessel welds.

4. BASIS FOR RELIEF

The welds listed on the attached were not inspected due to limitations of design and geometry. Access to perform in-place vessel ultrasonic examinations was not provided for in the original design. None of the feedwater heat exchanger (heater) dome-to-tube-sheet welds were examined ultrasonically due to numerous attachments which would obstruct significant portions of the scan paths. Moreover, the geometry of the weld joint (ie shell curvature and weld end preparation) has a limiting effect on examination coverage. To produce a specific calibration standard and develop unique ultrasonic techniques in order to examine only partially the required welds, would be an undue hardship. These efforts would not result in a compensating increase in assurance of weld integrity.

5. ALTERNATE EXAMINATION

Radiography as an alternate method is not practical to perform inservice due to the same design and geometric conditions which limit ultrasonic examination. Any examination additional to examination performed would result in an undue burden without a compensating increase in assurance of vessel weld integrity or plant safety.

NMP1, First Interval Inspection Relief Request 1IIRR8A
Category C-A
Page 2

6. PLANT QUALITY AND SAFETY

The completed, required functional, hydrostatic and other pressure tests (as applicable) provide and acceptable level of assurance of vessel weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

FIRST INSPECTION INTERVAL
REQUEST FOR RELIEF 1IIRR8A
CATEGORY C-A

Page 3

S'75 CODE CATEGORY ITEM	SYSTEM	IDENTIFICATION	DESCRIPTION	LIMITATION
C1.1	FW	HX-30-06-Dome	Dome to Tube Sheet	Tube Plate, 2 Lifting Lugs, 2 Pulling Lugs, Support Saddle & 2--16" Dia. Nozzles
C1.1	FW	HX-51-12-Dome	Dome to Tube Sheet	Tube Plate, 2 Lifting Lugs, 2 Pulling Lugs, Support Saddle & 2--16" Dia. Nozzles

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NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR8B

1. COMPONENT IDENTIFICATION

System: Feedwater
Quality Group: B
Component Description: Pressure Retaining Welds in Vessels

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975.

Class 2, Category C-B, Item C1.2 requires volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of nozzle-to-vessel attachment welds, of one of similar pressure vessels in multiple loops. Relief is requested for four (4) of eight required vessel nozzle welds.

4. BASIS FOR RELIEF

The welds listed on the attached were not inspected due to limitations of design and geometry of the partial penetration weld joint. Access to perform in-place vessel ultrasonic examinations was not provided for in the original design. Calcium silicate insulation was excavated to gain access for surface examination. Also, 3/4" and 1 1/2" nominal pipe size (NPS) attachments would obstruct significant portions of the scan paths. To excavate additional insulation, produce a specific calibration standard and develop unique ultrasonic techniques in order to examine only partially the required welds, would be an undue hardship. These efforts would not result in a compensating increase in assurance of weld integrity.

5. ALTERNATE EXAMINATION

Baseline magnetic particle examinations for the second inspection interval requirements were performed on the four nozzle welds.

Radiography as an alternate method is not practical to perform inservice due to the same design and geometric conditions which limit ultrasonic examination. Any examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of nozzle weld integrity or plant safety.

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NMP1, First Interval Inspection Relief Request 1IIRR8B
Category C-B
Page 2

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required functional, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of nozzle weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

FIRST INSPECTION INTERVAL
REQUEST FOR RELIEF 11IRR8B
CATEGORY C-B

Page 3

S'75 CODE CATEGORY ITEM	SYSTEM	IDENTIFICATION	DESCRIPTION	LIMITATION
C2.1	FW	HX-30-06-IN	Nozzle to Dome	Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld
C2.1	FW	HX-30-06-ON	Nozzle to Dome	Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld
C2.1	FW	HX-51-12-IN	Nozzle to Dome	Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld
C2.1	FW	HX-51-12-ON	Nozzle to Dome	Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld



NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR9

1. COMPONENT IDENTIFICATION

System: Various

Quality Group: B

Component Description: Pressure Retaining Welds in Piping

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1980 Edition with Addenda through Winter 1981

Class 2, Category C-F, Item Numbers C5.10, C5.20, C5.30 require a volumetric and/or surface examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric and/or surface examination of the area delineated in Figures IWC-2500-7 through IWC-2500-13. Relief is requested for twenty-four (24) of the one hundred and ninety (190) required piping welds.

4. BASIS FOR RELIEF

The welds listed on the attached were not fully inspected by ultrasonic and/or surface methods due to limitations of design, geometry, and materials of construction.

The dendritic structure of those welds which are made of stainless steel (SS) material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In general, both the non-parallel surfaces and the product form of the material of valves preclude meaningful ultrasonic examination from the valve side. Nine stainless steel welds received limited examination.

Fitting configuration limits meaningful ultrasonic examination of fourteen (14) welds. Hanger attachments limit physical access to four (4) welds and valve anchor structures preclude access to two (2) welds. Adjacent tubing, I-beam, superficial gouge or circumferential weld limits coverage for four (4) welds. The percentage of Code Required Area (CRA) and of Code Required Volume (CRV) that was completely examined is tabulated with the nature of the obstruction on the attached.

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5. ALTERNATE EXAMINATION

No alternate examinations were performed. The required surface examination was performed on all accessible welds.

Radiography of fitting welds would not result in a meaningful examination, due to double wall elliptical exposures necessitated from the outside surfaces. Multiple exposures would be necessary for complete coverage and would compound difficulties in evaluating results. Radiographic or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of piping weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

Six (6) unscheduled Class 2 piping welds were fully examined beyond Section XI requirements. Sixty-six (66) were to be inspected additionally per the augmented program. Moreover, other Class 2 piping welds, which had been partially examined volumetrically in the first or second inspection periods, were not counted towards the required total; these were subsequently removed from the first interval program and replaced with others.

The examinations as performed, together with the completed, required functional, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

FIRST INTERVAL INSPECTION

Page 3

REQUEST FOR RELIEF 1IIRR9

CATEGORY C-F

WELDS REQUIRING RELIEF FROM VOLUMETRIC AND SURFACE REQUIREMENTS

EXAMINATION AREA	DESCRIPTION	CRA EXAMINED	CRV EXAMINED	LIMITATION
MS 02-FW-11	Valve IV 01-03 to Pipe, CS	None	None	Valve Support Structure
MS 03-SW-7A	Pipe to Tee, CS	100%	83%	Fitting Configuration
FW 29-FW-10	Valve FCV-1D11A to Reducer, CS	100%	None	Fitting Configuration
FW 29-FW-14	Valve BV-29-10 to Elbow, CS	100%	83%	Fitting Configuration
FW 29-FW-30	Pipe to Valve 29-14, CS	100%	83%	Fitting Configuration
FW 29-FW-38	Pump 29-03 to Reducer, CS	100%	None	Fitting Configuration
FW 30-FW-13	Valve 30-20 to Pipe, CS	100%	83%	Fitting Configuration
FW 30-FW-14	Tee to Valve 30-13, CS	100%	66%	Fitting Configuration
FW 30-FW-16	Pipe to Valve 30-10, CS	100%	83%	Fitting Configuration
FW 30-FW-28	Elbow to Valve 29-13, CS	100%	83%	Fitting Configuration
FW 51-FW-1	Booster Pump 11 Nozzle to Pipe, CS	100%	88%	Fitting Configuration
FW 51-FW-87	Pipe to Pump 29-02, CS	98%	None Required	Adjacent Tubing
FW 51-SW-19A	Elbow to Pipe, CS	None	None Required	Permanent Hanger Attachment
SC 38-FW-11	Valve BV-39-05 to Pipe, SS	None	None	Permanent Hanger Attachment
SC 38-FW-11-U	Pipe Longitudinal Seam, SS	100%	None	Permanent Hanger Attachment
SC 38-FW-8	Pipe to Valve BV-38-03, SS	100%	83%	Fitting Configuration, Permanent Hanger Attachment
SC 38-FW-8-U	Pipe Seam, SS	100%	None	Permanent Hanger Attachment
SC 38-SW-130	Pipe to Reducer, SS	100%	68%	Adjacent I Beam
SC 38-SW-25A	Tee to Pipe, SS	100%	75%	Adjacent Circumferential Weld
EC 39-FW-15	Pipe to Valve IV 39-05, SS	100%	58%	Fitting Configuration
EC 39-FW-40	Pipe to Nozzle, SS	100%	97%	Superficial Gouge on Weld
EC 39-FW-7	Pipe to Valve 39-06, SS	100%	58%	Fitting Configuration
CRD 44.2-NES-39	Reducer to Elbow, CS	100%	95%	Fitting Configuration
CRD 44.2-NES-27	Elbow to Pipe, CS	None	None Required	Valve Support Structure



NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR10

1. COMPONENT IDENTIFICATION

System: Core Spray
Quality Group: B
Component Description: Pressure Retaining Welds in Pumps

2. ASME CODE SECTION XI FIRST INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

Class 2, Category C-F, Item Number C3.1 requires volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of pump casing welds in one of the multiple streams of the piping system in the first inspection interval. Relief is requested for all of the required pump welds.

4. BASIS FOR RELIEF

The pressure retaining pump casing welds were not volumetrically inspected due to limitations of design and geometry. Due to fillet weld joints or right angle surfaces of the nozzles, top column, internal flanges and outer casing, ultrasonic examination of accessible welds would not result in a meaningful examination. Relief is requested for casing welds in one of each of core spray multistage vertical and core spray centrifugal pumps.

5. ALTERNATE EXAMINATION

For pump nozzle-to-casing welds 81-PM-24-SW-2 and 81-PM-24-SW-3, a magnetic particle examination was performed as a baseline for second interval requirements. Also, examinations were performed at the time pumps were disassembled for maintenance. A visual examination was performed on Core Spray Pump 112 as a whole, on its casing, on its replaced impeller and on its replacement impeller. Also, visual examination was performed on the casings of Core Spray Pumps 81-111, 81-121, and 81-122. Moreover, on the Containment Spray Pump 121 80-03, the nozzle-to-extension-piece casing weld was visually examined. (The Containment Spray Pumps are similar to the Core Spray Multistage Vertical Pumps: both are made by the same manufacturer: Worthington Corporation; and are of similar design: multistage vertical process; and are of similar size and capacity: 350 versus 240 horsepower at 1800 revolutions per minute, delivering 2900 versus 3100 gallons per minute).

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Radiography as an alternate examination of pump casing welds would not result in a meaningful examination. The differing surface curvatures at right angle to each other would necessitate multiple exposures at multiple locations, compounding evaluation of results. Radiographic examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of pump casing weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required functional, hydrostatic, and other pressure tests (as applicable), provide an acceptable level of assurance of pump casing weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

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NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR11

1. COMPONENT IDENTIFICATION

System: Various

Quality Group: Augmented Class I

Component Description: Nonconforming Service Sensitive Piping Welds

2. AUGMENTED INSERVICE INSPECTION GUIDELINES OF NUREG 0313

Revision 1, July 1980

Class 1 piping welds require volumetric and surface examination.

3. RELIEF REQUESTED

Relief is requested from NUREG 0313 full volumetric and surface examination of nonconforming service sensitive piping welds. Relief is requested for sixty-four (64) of the two hundred and seventy-five (275) scheduled piping welds.

4. BASIS FOR RELIEF

The welds listed on the attached were not fully inspected by ultrasonic and/or surface methods due to limitations of design, geometry, and material of construction.

The dendritic weld structure of the stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In particular, non-parallel surfaces and product form of the material of valves preclude meaningful ultrasonic examination from the valve side.

Thirty-six (36) stainless steel welds were limited by fitting configuration, sixteen (16) primarily by permanent attachment to the piping, eleven (11) by containment penetrations, and one (1) by adjacent piping. The percentage of Code Required Area (CRA) and Code Required Volume (CRV) that was completely examined is tabulated with the nature of the obstruction on the attached.

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5. ALTERNATE EXAMINATION

No alternate examination was performed. The required surface examination was performed on all accessible welds.

Radiography of fitting welds would not result in a meaningful examination, due to double wall elliptical exposures necessitated from the outside surfaces. Multiple exposures would be necessary for complete coverage and would compound difficulties in evaluating results. There is no access to perform an alternate examination of the welds inside the containment penetration sleeve. Radiographic examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of nonconforming service sensitive piping weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

Per NUREG 0313, the Core Spray System (40) piping is defined as non-conforming service sensitive; the extent and frequency of examination is 100% of welds every refueling outage. Other system welds that were selected for this augmented examination program were examined each outage and thus had been more frequently inspected than required by NUREG 0313. The six welds listed as interconnections with reactor recirculation system (32) received augmented inspection beyond NUREG 0313 due to high stress.

The examinations as performed, together with the required, completed leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of non-conforming service sensitive piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



FIRST INSPECTION INTERVAL

Page 3

REQUEST FOR RELIEF 1IIRR11

NUREG 0313 AUGMENTED REQUIREMENTS

WELD CLASSIFICATION B-J or B-F

| SYSTEM | EXAMINATION
AREA | DESCRIPTION | REQUIRED
METHOD | EXTENT
EXAMINED | LIMITATION |
|----------|---------------------|------------------------|--------------------|--------------------|---|
| RPV HS&V | P-34-FW-12 | Pipe to Elbow | PT | 95% CRA | Permanent Hanger Attachment |
| RPV HS&V | P-34-FW-17 | Valve 34-01 to Pipe | PT | None | Inaccessible at Penetration |
| SC | 38-FW-3 | Valve 38-01 to Pipe | UT PT | None | Permanent Hanger Attachment,
Fitting Configuration |
| SC | 38-FW-3-D | Pipe Seam | UT PT | None | Permanent Hanger Attachment,
Fitting Configuration |
| SC | 38-SW-27A | Pipe to Pipe | UT PT | None | Inaccessible Inside Penetration |
| SC | 38-SW-27A-D | Pipe Seam | UT PT | None | Inaccessible Inside Penetration |
| SC | 38-SW-27A-U | Pipe Seam | UT PT | None | Inaccessible Inside Penetration |
| SC | 38/32-FW-14S-22 | Tee to Pipe | UT PT | 62% CRV | Fitting Configuration |
| SC | 38/32-FW-15D-13 | Tee to Pipe | UT PT | 62% CRV | Fitting Configuration |
| SC | 38/32-FW-14D-13-U | Pipe Seam | UT PT | No UT | Hanger Attachment |
| EC | 39/32-FW-11S-22 | Pipe to Tee | UT PT | 58% CRV | Fitting Configuration |
| EC | 39/32-FW-11S-24 | Valve 39-04 to Reducer | UT PT | No UT | Fitting Configuration, Material |
| EC | 39/32-FW-15S-22 | Pipe to Tee | UT PT | 75% CRV | Fitting Configuration |
| CS | 40-FW-10 | Tee to Valve 40-10 | UT PT | 48% CRV | Fitting Configuration, Material |
| CS | 40-FW-16 | Valve 40-12 to Pipe | UT PT | None | Inaccessible at Penetration |
| CS | 40-FW-16-D | Pipe Seam | UT PT | None | Inaccessible Inside Penetration |
| CS | 40-FW-17 | Elbow to Valve 40-12 | UT PT | 58% CRV | Fitting Configuration |
| CS | 40-FW-18 | Valve 40-13 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-21 | Valve 40-06 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-24 | Valve 40-09 to Elbow | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-25 | Pipe to Valve 40-09 | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-26 | Valve 40-01 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-27 | Tee to Valve 40-01 | UT PT | 89% CRV | Fitting Configuration, Material |
| CS | 40-FW-2A | Pipe to Pipe | UT PT | 88% CRV | Permanent Hanger Attachment |
| CS | 40-FW-2A-U | Pipe Seam | UT PT | 88% CRA & CRV | Permanent Hanger Attachment |



FIRST INSPECTION INTERVAL

REQUEST FOR RELIEF 11IRRL1

Page 4

NUREG 0313 AUGMENTED REQUIREMENTS

WELD CLASSIFICATION B-J or B-F (Cont'd)

| SYSTEM | EXAMINATION
AREA | DESCRIPTION | REQUIRED
METHOD | EXTENT
EXAMINED | LIMITATION |
|--------|---------------------|----------------------|--------------------|--------------------|---|
| CS | 40-FW-30 | Valve 40-02 to Pipe | UT PT | None | Inaccessible at Penetration |
| CS | 40-FW-31 | Elbow to Valve 40-02 | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-32 | Valve 40-03 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-33 | Pipe to Flange | UT PT | 75% CRV | Fitting Configuration |
| CS | 40-FW-34 | Valve 40-05 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-34A | Pipe to Elbow | UT PT | 66% CRV | Permanent Hanger Interference |
| CS | 40-FW-5 | Tee to Pipe | UT PT | 86% CRV | Fitting Configuration |
| CS | 40-FW-5-D | Pipe Seam | UT PT | No UT | Permanent Hanger Attachment |
| CS | 40-FW-55 | Pipe to Pipe | UT PT | 82% CRV | Permanent Hanger Interference |
| CS | 40-FW-7 | Valve 40-11 to Elbow | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-8 | Pipe to Valve 40-11 | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-9 | Valve 40-10 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-9-D | Pipe Seam | UT PT | None | Permanent Hanger Attachment |
| CS | 40-SW-36B | Elbow to Nozzle | UT PT | 58% CRV | Fitting Configuration |
| CS | 40-SW-36C | Nozzle to Pipe | UT PT | No UT | Fitting Configuration |
| CS | 40-SW-37A | Elbow to Pipe | UT PT | None | Obstructed by Penetration |
| CS | 40-SW-37A-U | Pipe Seam | UT PT | None | Inaccessible Inside Penetration |
| CS | 40-SW-37A-D | Elbow Seam | UT PT | 66% CRV | Fitting Configuration,
Permanent Hanger Attachment |
| CS | 40-SW-39C | Pipe to Tee | UT PT | 89% CRV | Fitting Configuration |
| CS | 40-SW-39E | Pipe to Elbow | UT PT | 84% CRV | Permanent Hanger Attachment |
| CS | 40-SW-39F | Elbow to Pipe | UT PT | None | Permanent Hanger Attachment |
| CS | 40-SW-40B | Tee to Pipe | UT PT | 89% CRV | Fitting Configuration |
| CS | 40-SW-40C | Pipe to Tee | UT PT | 98% CRV | Fitting Configuration |
| CS | 40-SW-40D | Pipe to Tee | UT PT | 86% CRV | Fitting Configuration |
| CS | 40-SW-40E-D | Pipe Seam | UT PT | 67% CRV | Obstructed by Adjacent Piping |
| CS | 40-SW-45C | Nozzle to Pipe | UT PT | No UT | Fitting Configuration |



FIRST INSPECTION INTERVAL

Page 5

REQUEST FOR RELIEF 11IR11

NUREG 0313 AUGMENTED REQUIREMENTS

WELD CLASSIFICATION B-J or B-F (Cont'd)

| SYSTEM | EXAMINATION
AREA | DESCRIPTION | REQUIRED
METHOD | EXTENT
EXAMINED | LIMITATION |
|--------|---------------------|---------------------------|--------------------|--------------------|---------------------------------|
| CS | 40-SW-45D | Pipe to Nozzle | UT PT | 75% CRV | Fitting Configuration |
| CS | 40-SW-46A | Pipe to Elbow | UT PT | None | Obstructed by Penetration |
| CS | 40-SW-46A-U | Pipe Seam | UT PT | None | Inaccessible Inside Penetration |
| CS | 40-SW-48A | Pipe to Elbow | UT PT | 92% CRV | Obstructed by 4 Lugs |
| CS | 40-SW-48A-U | Pipe Seam | UT PT | No PT | Permanent Hanger Attachment |
| CS | 40-SW-49A | Pipe to Tee | UT PT | 96% CRV | Fitting Configuration |
| CS | 40-SW-49A-U | Pipe Seam | UT PT | 90% CRV | Permanent Hanger Attachment |
| CS | 40-SW-49B | Tee to Pipe | UT PT | 79% CRV | Fitting Configuration |
| CS | 40-SW-49B-D | Pipe Seam | UT PT | 66% CRV | Obstructed by Lug |
| CS | 40-SW-51C | Pipe to Tee | UT PT | 94% CRV | Fitting Configuration |
| CS | 40-SW-51D | Pipe to Tee | UT PT | 86% CRV | Fitting Configuration |
| CRD | 44.1-FW-13 | Valve 301-114 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CRD | 44.1-FW-12 | Valves 301-113 to 301-114 | UT PT | No UT | Fitting Configuration, Material |

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NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR12

1. COMPONENT IDENTIFICATION

System: , Various
Quality Group: Augmented Class 2
Component Description: Nonconforming Service Sensitive Piping Welds

2. AUGMENTED INSERVICE INSPECTION GUIDELINES OF NUREG 0313

Revision 1, 1980

Class 2 piping welds require volumetric and/or surface examination.

3. RELIEF REQUESTED

Relief is requested from the NUREG 0313 100% volumetric and surface examination of nonconforming service sensitive piping welds. Relief is requested for seven (7) of the required sixty-six (66) welds.

4. BASIS FOR RELIEF

The welds listed on the attached were not fully inspected by ultrasonic and/or surface methods due to limitations of design, geometry, and material of construction.

The dendritic weld structure of the stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In particular, non-parallel surfaces and product form of the material of valves preclude meaningful ultrasonic examination from the valve side.

Three (3) stainless steel welds were limited by fitting configuration, one (1) by permanent attachment to the piping, two (2) by adjacent circumferential piping weld, and one (1) weld was limited by a superficial gouge. The percentage of Code Required Volume (CRV) that was completely examined is tabulated with the nature of the obstruction on the attached.

5. ALTERNATE EXAMINATION

No alternate examination was performed. The required surface examination was performed on all accessible welds.

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Radiography of fitting welds would not result in a meaningful examination, due to double wall elliptical exposures necessitated from the outside surfaces. Multiple exposures would be necessary for complete coverage and would compound difficulties in evaluating results. Radiographic or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of non-conforming sensitive piping weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

The welds which were selected for this augmented examination program were examined each outage and thus had been more frequently inspected than required by NUREG 0313. The examinations as performed, together with the completed, required functional, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of non-conforming sensitive piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



FIRST INSPECTION INTERVAL

Page 3

REQUEST FOR RELIEF 1IIRR12

NUREG 0313 AUGMENTED REQUIREMENTS

WELD CLASSIFICATION C-F

| SYSTEM | EXAMINATION
AREA | DESCRIPTION | REQUIRED
METHOD | EXTENT
EXAMINED | LIMITATION |
|--------|---------------------|---------------------|--------------------|--------------------|---------------------------------|
| SC | 38-SW-100-U | Pipe Seam | UT PT | None | Permanent Hanger Attachment |
| SC | 38-SW-102 | Tee to Pipe | UT PT | 86% CRV | Fitting Configuration |
| SC | 38-SW-25A | Tee to Pipe | UT PT | 75% CRV | Adjacent Circumferential Weld |
| SC | 38-SW-84 | Pipe to Pipe | UT PT | 75% CRV | Adjacent Circumferential Weld |
| EC | 39-FW-15 | Pipe to Valve 39-05 | UT PT | 58% CRV | Fitting Configuration, Material |
| EC | 39-FW-40 | Pipe to Nozzle | UT PT | 97% CRV | Superficial Gouge on Weld |
| EC | 39-FW-7 | Pipe to Valve 39-06 | UT PT | 58% CRV | Fitting Configuration, Material |

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NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR13

1. COMPONENT IDENTIFICATION

System: Closed Loop Cooling, Condensate Storage and Transfer, Sealing Water

Quality Group: B and C

Component Description: Non-Isolatable Portions of Class 2 and Class 3 piping systems

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

IWA-5000, IWC-5000, and IWD-5000 require visual examination during system hydrostatic pressure test.

3. RELIEF REQUESTED

Relief is requested from the ten year interval requirement to hydrostatically test at elevated pressure the ASME safety class portions of piping systems identified as nonisolatable. These portions of N1-ISI-HYD-70/70.1 are Blocks 11 and 13 and the reactor cleanup non-regenerative heat exchanger secondary side and its associated piping. These portions of N1-ISI-HYD-57/91 are Block 3.

4. BASIS FOR RELIEF

These system portions were not tested at the hydrostatic test pressure. Due to the unisolatable single discharge header and the uninterruptable service requirements for cooling of plant safety related equipment, it is impractical and unsafe to isolate these portions for hydrostatic pressure testing.

5. ALTERNATE TEST

Visual VT-2 examination was performed on these portions at normal operating pressure upon verification of flow from pump discharges.

6. PLANT QUALITY AND SAFETY

The examinations as performed provide an acceptable level of assurance of piping system integrity. Should the plant be modified to install additional headers allowing isolation of associated components of these blocks, hydrostatic pressure testing during plant operation could be conducted safely.

7. RADIATION CONSIDERATIONS

Radiation Considerations are not a basis for this request for relief.



NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR14

1. COMPONENT IDENTIFICATION

System: Fuel Pool Cooling
Quality Group: C
Component Description: Fuel Pool Cooling System Piping

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

IWA-5000 and IWD-5000 require visual examination during system hydrostatic pressure test.

3. RELIEF REQUESTED

Relief is requested from the ten year interval requirement to hydrostatically test at elevated pressure the fuel pool cooling ASME safety class portions identified as Block 1 of N1-ISI-HYD-54.

4. BASIS FOR RELIEF

This portion of piping was not tested at the hydrostatic test pressure. It was tested at a reduced pressure to avoid overpressurizing the gaskets of the filters (11) 54-03 and (12) 54-06. Overpressurization of the filter gaskets would cause leakage and spread contamination in the plant.

5. ALTERNATE TEST

Visual VT-2 examination was performed on these portions at 75 psig.

6. PLANT QUALITY AND SAFETY

The examination as performed provides an acceptable level of assurance of piping system integrity. Should the plant be modified to allow higher pressures at the fuel pool cooling filters or to by-pass the filters, hydrostatic pressure testing during plant operation could be conducted safely.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR15

1. COMPONENT IDENTIFICATION

System: Main Steam, Turbine By-Pass Valve

Quality Group: B

Component Description: Main Steam Class 2 Piping

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

IWA-5000 and IWC-5000 require visual examination during system hydrostatic pressure test.

3. RELIEF REQUESTED

Relief is requested from the ten year interval requirement to hydrostatically test the Class 2 portion of main steam piping at the elevated Class 2 pressure. This piping portion is identified by Appendix A of N1-ISI-HYD-01.

4. BASIS FOR RELIEF

This portion of piping was not tested at the Class 2 hydrostatic pressure 1285 psig. It was tested at the Class 1 hydrostatic pressure of 1145 psig in conjunction with the Reactor Pressure Vessel (RPV) and Class 1 systems. The main steam isolation valves are unidirectional valves designed to close with the direction of flow from the reactor pressure vessel, and thus are designed to withstand a pressure differential of only approximately 35 psig in the reverse direction. Performance of the test at Class 2 pressure from the outboard side of the valve would exceed this valve seat design for the reverse direction. Non-isolatable Class 1 portions of piping back through the RPV are not designed for the elevated Class 2 hydrostatic test pressure.

Moreover, the leakage past the seat of turbine stop valve resulted in the inability of a high pressure/low volume hydrostatic pressure pump to provide make-up volume so as to maintain the elevated Class 2 pressure.

5. ALTERNATE TEST

Visual VT-2 examination was performed on this portion at Class 1 hydrostatic test pressure.

6. PLANT QUALITY AND SAFETY

The examination as performed provides an acceptable level of assurance of piping system integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

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NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIRR16

1. COMPONENT IDENTIFICATION

System: Control Rod Drive Piping

Quality Group: B

Component Description: CRD Insert and Withdraw Lines, Charging Water Lines, and Stabilizing valves

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

IWA-5000 and IWC-5000 require visual examination during system hydrostatic pressure test.

3. RELIEF REQUESTED

Relief is requested from the ten year interval requirement to visually examine during hydrostatic Class 2 pressure test the portion of the insert and withdraw lines inboard to the reactor pressure vessel (RPV) from valves 101 (CRD-E) and 102 (CRD-F), and the portion of the charging water header thru accumulators to the directional control valving. These are portions of piping for one hundred and twenty-nine (129) drives. Relief is requested from the ten year interval requirement to visually examine the system stabilizing valve banks during hydrostatic Class 2 pressure test. All of these portions are Class 2 piping outside of the blocks of CRD Class 2 system piping identified in N1-ISI-HYD-28/44.

4. BASIS FOR RELIEF

These portions of piping were not VT-2 examined during hydrostatic pressure test. These portions of piping were not tested at the Class 2 hydrostatic pressure. The insert and withdraw line portions were pressurized at the Class 1 hydrostatic pressure of 1150 psig in conjunction with the RPV and Class 1 systems. The design of the control rod drive mechanism provides for leakage past the drive piston and collet piston. This leakage would result in the inability to achieve the elevated Class 2 hydrostatic test pressure or would result in subjecting the RPV and Class 1 non-isolatable portions to the elevated Class 2 pressure.



NMP1 First Interval Inspection Relief Request 1IIRR16
Hydrostatic Pressure Test
Page 2

5. ALTERNATE EXAMINATION

Functional testing of 100% of the CRD mechanisms was performed and the CRD housings had been re-examined for leakage prior to the reactor going critical. At the time of Class 1 RPV and Class 2 CRD hydrostatic pressure testing, any leakage at terminations of the insert withdraw line portions would have been recorded in the examination report. Insert and withdraw lines had been visually examined during leakage pressure tests of previous refueling outages.

6. PLANT QUALITY AND SAFETY

The examinations and tests as performed provide an acceptable level of assurance of piping system integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

NINE MILE POINT UNIT 1

Preservice Inspection

Relief Request Number PSIRR1

1. COMPONENT IDENTIFICATION

System: Emergency Cooling, Reactor Water Cleanup
Quality Group: A
Component Description: Pressure Retaining Piping Replacement Welds

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1980 Edition with Addenda through Winter 1981

Class 1, Category B-F, B-J require surface and volumetric examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric and surface examination of the nonexempt pressure retaining welds prior to resumption of service following replacement, addition, or alteration. Relief is requested for eight (8) of the twenty-two (22) welds replaced in the 1986 refueling outage.

4. BASIS FOR RELIEF

The welds listed on the attached were not fully inspected due to limitations of design, geometry, and material of construction. The dendritic weld structure of the stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In particular, nonparallel surfaces and product form of the material of valves preclude meaningful ultrasonic examination from the valve side. Seven (7) stainless steel welds were limited ultrasonically by fitting configuration, and one (1) stainless steel weld was limited in ultrasonic and surface methods by permanent attachment to the piping. The percentage of Code Required Volume (CRV) that was completely examined is tabulated with the nature of the obstruction on the attached.

5. ALTERNATE EXAMINATION

All Replacement Piping Welds were examined by Radiography in accordance with Section III of the ASME code. The required surface examination was performed on all accessible welds.



NMP1, Preservice Inspection Relief Request PSIRRI
Replacement Piping, Class 1
Page 2

Radiography inservice of fitting welds would not result in a meaningful examination, due to double wall elliptical exposures necessitated from the outside surfaces. Multiple exposures would be necessary for complete coverage and would compound difficulties in evaluating results. Radiographic examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of piping weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

The examinations as performed, together with the completed, required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of replacement piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

1986 OUTAGE PRESERVICE INSPECTION

REQUEST FOR RELIEF PSIRRI

REPLACEMENT PIPING, CLASS 1

| SYSTEM | EXAMINATION
AREA | DESCRIPTION | CODE
CATEGORY | EXTENT
EXAMINED | LIMITATION |
|--------|---------------------|-------------------------|------------------|--------------------|-----------------------------|
| EC | 39-FW-4043-016 | Pipe to Valve 39-09R | B-J | 58% CRV | Fitting Configuration |
| EC | 39-FW-4043-017 | Valves 39-09R to 39-07R | B-J | No UT | Fitting Configuration |
| EC | 39-FW-4043-030 | Pipe to Valve 39-10R | B-J | 58% CRV | Fitting Configuration |
| EC | 39-FW-4043-031 | Valves 39-10R to 39-08R | B-J | No UT | Fitting Configuration |
| RWCU | 33-FW-0261-01 | Pipe to Valve 33-02R | B-J | 62% CRV | Fitting Configuration |
| RWCU | 33-FW-0261-02 | Valve 33-02R to Pipe | B-J | 62% CRV | Fitting Configuration |
| RWCU | 33-FW-0261-06 | Pipe to Valve 33-01R | B-J | 62% CRV | Fitting Configuration |
| RWCU | 33-FW-0261-04 | Pipe to Pipe | B-F | 90% CRV | Permanent Hanger Attachment |

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NINE MILE POINT UNIT 1

Preservice Inspection

Relief Request Number PSIRR2

1. COMPONENT IDENTIFICATION

System: Reactor Recirculation

Quality Group: A

Component Description: Pressure Retaining Piping Welds Altered
Inservice by Induction Heating for Stress
Improvement (IHSI)

2. ASME CODE SECTION XI PRESERVICE INSPECTION REQUIREMENTS

1980 Edition with Addenda through Winter 1981

Class 1, Category B-J requires a surface and volumetric examination. S'75
IWB-2200(c) requires examination of altered components.

3. RELIEF REQUESTED

Relief is requested from the requirement to fully examine by volumetric
and surface methods 100% of the non-exempt pressure retaining welds, prior
to resumption of service, following replacement, addition, or alteration.
Relief is requested for all of these twenty-five (25) welds requiring
examination following IHSI.

4. BASIS FOR RELIEF

The welds receiving IHSI were volumetrically examined. Alterations in the
microstructure of the welds affected are not likely to be detected by
surface examination. Heat treatment in accordance with acceptable
procedures typically do not alter macroscopic features detectable by
surface examination. The welds listed on the attached were not fully
inspected volumetrically due to limitations of design, geometry, and/or
material of construction. The dendritic structure of those welds which
are made of stainless steel material can result in both sound redirection
and attenuation phenomena which limit ultrasonic interrogation. Thus,
such welds necessitate examination from both sides in order to be fully
examined. In general both the geometry of non-parallel surfaces and the
product form of the material of valves preclude meaningful ultrasonic
examination from the valve side. The six (6) listed welds were limited in
ultrasonic examination by fitting configuration. The percentage of Code
Required Volume (CRV) that was completely examined is tabulated with the
nature of obstruction on the attached.

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5. ALTERNATE EXAMINATION

No alternate examination was performed.

Radiography of fitting welds would not result in a meaningful examination due to elliptical exposures necessitated from the outside surfaces. Multiple exposures would be necessary for complete coverage and would compound difficulties in evaluating results. Volumetric or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of piping weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

Surface examination was performed, on only the thermocouple attachment areas following thermocouple removal, for twenty-two of these welds receiving IHSI. Additionally, the pipe-to-pipe weld 32-FW-14D-4 was examined, just prior to receiving IHSI, by automated Ultrasonic Data Recording and Processing System equipment. Moreover, five welds (including 32-FW-14D-4) were ultrasonically examined using more than one of the following equipment systems: Manual, SMART, Ultrimage III, or Ultrasonic Data Recording and Processing.

The examinations as performed, together with the completed, required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of altered piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



1986 OUTAGE PRESERVICE INSPECTION

REQUEST FOR RELIEF PSIRR2

IHSI ALTERED PIPING, CLASS 1

Page 3

| SYSTEM | EXAMINATION
AREA | DESCRIPTION | CODE
CATEGORY | EXTENT
EXAMINED | LIMITATION |
|--------|---------------------|----------------------|------------------|--------------------|--------------------------------|
| RR | 32-FW-12S-5 | Valve NG02-B to Pipe | B-J | 58% | Fitting Configuration,Material |
| RR | 32-FW-13S-5 | Valve NG02-C to Pipe | B-J | 58% | Fitting Configuration,Material |
| RR | 32-FW-13D-6 | Pipe to Valve NG03-C | B-J | 58% | Fitting Configuration,Material |
| RR | 32-FW-14D-6 | Pipe to Valve NG03-D | B-J | 58% | Fitting Configuration,Material |
| RR | 32-FW-15D-3 | Tee to Elbow | B-J | 62% | Fitting Configuration,Material |
| RR | 32-FW-15S-4 | Tee to Pipe | B-J | 58% | Fitting Configuration,Material |



NINE MILE POINT UNIT 1

First Interval Inspection

Relief Request Number 1IIR17

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel
Quality Group: A
Component Description: Support Skirt Integral Attachment Weld

2. ASME CODE SECTION XI FIRST INTERVAL INSPECTION REQUIREMENTS

1974 Edition with Addenda through Summer 1975

Class 1, Category B-H, Item B1.12 requires a volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of the Reactor Pressure Vessel Skirt Integral Attachment Weld.

4. BASIS FOR RELIEF

The Reactor Pressure Vessel -to-Skirt weld was not inspected ultrasonically due to limitations of design and geometry. The Support Skirt forging knuckle has non-parallel surfaces and has no physical access to the inner surface. This geometry and design preclude meaningful ultrasonic examination.

5. ALTERNATE EXAMINATION

Surface examination with Liquid Penetrant of the outer surface was performed in accordance with the ASME Code Section XI 1980 Edition with Addenda through Winter 1981. Surface examination of the inner surface, or radiographic examination as an alternate method, are not possible due to the same conditions which preclude ultrasonic examination. Radiographic or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of Reactor Vessel-to-Skirt Weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

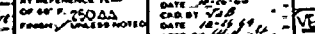
The examinations as performed, together with the completed, required leakage, hydrostatic, and other pressure tests (as required), provide an acceptable level of assurance of integrity of integrally welded attachment and pressure retaining boundary.



7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.





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| | 260-02 UPPER |
| | ADDED GLASS 10 |
| | NO. 260-13, REV. |
| | 1 LOWER SUPPORT |
| A-8 | SECTION A-A |
| A-6 | ADDED FORWARD |
| D-4 | ADDED MACHIN |
| A-8 | MOVING TOLL L |
| | DELETED WELD NO. |
| | NO. 6-560, 7-B |



NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-1

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel
Class: 1
Component Description: Reactor Pressure Vessel

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-A, Item B1.10 one beltline region weld - volumetric examination

3. RELIEF REQUESTED

Relief is requested from the volumetric examination of one beltline region weld.

4. BASIS FOR RELIEF

Accessibility for inspection of welds in the core beltline region was not provided for in the original plant design. Inspection from outside the vessel is prevented due to the vessel's permanent mirror insulation (which is mounted to the vessel) and close proximity of the sacrificial shield wall. There is approximately 7 inches of clearance between the insulation and the shield wall which is insufficient to allow direct access of personnel. Even if the non-replaceable insulation were removed from the reactor vessel, only 4 inches of additional clearance would be afforded, which is still insufficient for personnel access.

5. ALTERNATE EXAMINATION

A remote visual examination of the accessible beltline region welds will be performed from the inside of the reactor pressure vessel.

Visual inspection (VT-2) of the areas beneath the reactor pressure vessel will be conducted for evidence of leakage during system hydrostatic tests when performed as required by IWB-5000.

Relief Request ISI-1
Page 2

6. PLANT QUALITY AND SAFETY

The examinations as proposed together with the required leakage and hydrostatic tests provide an acceptable level of assurance of reactor pressure vessel integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

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NINE MILE POINT UNIT 1

Second Interval
Inservice Inspection
Relief Request ISI-2

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel
Class: 1
Component Description: Vessel-to-Nozzle Weld and Inner Radius

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-D, Item B3.90 Nozzle to Vessel Welds - Volumetric examination;
Item B3.100 Nozzle inside Radius Section - Volumetric examination

3. RELIEF REQUESTED

Relief is requested from 100% volumetric examination for twenty-one (21) of the required forty (40) Category B-D nozzles.

4. BASIS FOR RELIEF

The nozzle sections listed on the attached will not be fully inspected ultrasonically due to limitations of design. Access to perform nozzle examinations was not provided for in the original design. The vessel's permanent mirror insulation and clearance of seven inches to the biological shield wall prevented inspection. Movable sections in the insulation were subsequently installed. The access opening through the movable doors of the biological shield and through the permanent insulation restrict full coverage of the code required volume (CRV). Extremely long ultrasonic scan paths are required due to the large thickness of the vessel wall and nozzle barrel.

The percentage of CRV that was completely examined during the first interval is tabulated on the attached, first for the inner radius (r) section and next for the weld (w) section of the obstructed nozzles. This percentage of examination coverage was determined by averaging the coverage of each scan of the required volume from both sides for the weld (w) and by using a weighted average of such coverage for the inner radius (r) adjacent volume.

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5. ALTERNATE EXAMINATION

A surface examination of the inside nozzle bore and adjacent radius section will be performed in accordance with NUREG 0619 on Feedwater nozzles RV-4-566 (A, B, C & D) and CRD return line nozzle RV-6-567. In accordance with Relief Requests ISI-1 a remote interior visual examination will be performed on accessible beltline region welds.

Radiography of the partially inspected nozzles would not yield meaningful inservice evaluation of weld or radius metal without multiple long exposures involving a number of different film types and speeds. This is due to the geometric configuration of the inside right angle surfaces, and of massive wall thickness of the vessel and nozzle barrel. Both inside and outside surfaces would have to be made accessible. High radiation fields would necessitate prohibitively long exposures even with an extremely active radiographic source. Surface examination of the nozzle outside surface would not safely detect cracks which operating experience has shown to originate on the inside surface of those nozzles subject to cyclic thermal stresses. Radiographic or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of nozzle weld or barrel integrity and plant safety.

6. PLANT QUALITY AND SAFETY

The examinations as proposed, together with the required leakage, hydrostatic and other pressure tests (as applicable) provide an acceptable level of assurance of nozzle weld and barrel integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

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RELIEF REQUEST ISI-2

| <u>EXAMINATION AREA</u> | <u>NOZZLE DESCRIPTION</u> | <u>CRV EXAMINED</u> | <u>LIMITATION</u> |
|-------------------------|---------------------------|---------------------|---|
| RV-1-565A(-r,-w) | RR Inlet | 60%, None | Bottom Head Taper of Shell Thickness |
| RV-1-565B(-r,-w) | RR Inlet | 60%, None | Bottom Head Taper of Shell Thickness |
| RV-1-565C(-r,-w) | RR Inlet | 60%, None | Bottom Head Taper of Shell Thickness |
| RV-1-565D(-r,-w) | RR Inlet | 60%, None | Bottom Head Taper of Shell Thickness |
| RV-1-565E(-r,-w) | RR Inlet | 60%, None | Bottom Head Taper of Shell Thickness |
| RV-2-566A(-r,-w) | EC | 55%, 65% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-2-566B(-r,-w) | EC | 75%, 73% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-2-567A(-r,-w) | CS | 66%, 66% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-2-567B(-r,-w) | CS | 54%, 56% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-3-565A(-r,-w) | RR Outlet | 73%, 65% | Lug, Adjacent Nozzle, Non-Movable Bioshield |
| RV-3-565B(-r,-w) | RR Outlet | 73%, 65% | Non-Movable Bioshield |
| RV-3-565C(-r,-w) | RR Outlet | 73%, 65% | Lug, Adjacent Nozzle, Non-Movable Bioshield |
| RV-3-565D(-r,-w) | RR Outlet | 73%, 65% | Non-Movable Bioshield |
| RV-3-565E(-r,-w) | RR Outlet | 73%, 63% | Lug, Thermocouple, Non-Movable Bioshield |
| RV-4-566A(-r,-w) | FW | 82%, 94% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-4-566B(-r,-w) | FW | 47%, 78% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-4-566C(-r,-w) | FW | 84%, 86% | Adjacent nozzle, Non-Movable Bioshield |
| RV-4-566D(-r,-w) | FW | 59%, 85% | Non-Movable Bioshield |
| RV-6-566A(-r,-w) | MS | 54%, 87% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-6-566B(-r,-w) | MS | 79%, 91% | Adjacent Nozzle, Non-Movable Bioshield |
| RV-6-567 (-r,-w) | CRD Return | 48%, 63% | Non-movable Bioshield |



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**Second Interval'
Inservice Inspection
Relief Request ISI-3**

| | |
|------------------------|---|
| System | Reactor Water Cleanup |
| Class: | I |
| Component Description: | Pressure Retaining Dissimilar Metal Welds |

1983 Edition with Addenda through Summer 1983

Category B-F, Item B5.130 Dissimilar metal butt welds - volumetric and surface examination.

Relief is requested from 100% volumetric and surface examination of dissimilar metal weld 33-FW-RCU-10-2A.

"This weld is inaccessible inside a containment penetration.

No alternate examination is proposed.

The required leakage, hydrostatic and other pressure tests (as applicable) along with the examination of other B-F welds in the plant provide an acceptable level of assurance of this weld's integrity.

Radiation considerations are not a basis for this request for relief.



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NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-4

1. COMPONENT IDENTIFICATION

Systems: Reactor Water Cleanup
Class: 1
Component Description: Pressure Retaining Dissimilar Metal Welds

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-F, Item B5.130 Dissimilar metal butt welds - volumetric examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric and surface examination of the dissimilar metal butt weld listed on the attached table.

4. BASIS FOR RELIEF

The weld listed on the attached cannot be fully inspected due to limitations of design, geometry, and material of construction. The dendritic weld structure of the stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined.

5. ALTERNATE EXAMINATION

No alternate examination is proposed.

6. PLANT QUALITY AND SAFETY

The examinations as proposed, together with the required leakage, hydrostatic and other pressure tests (as applicable) provide an acceptable level of assurance of weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



RELIEF REQUEST ISI-4

| <u>SYSTEM</u> | <u>EXAMINATION AREA</u> | <u>DESCRIPTION</u> | <u>CODE
CATEGORY</u> | <u>EXTENT
EXAMINED</u> | <u>LIMITATION</u> |
|---------------|-------------------------|--------------------|--------------------------|----------------------------|--------------------------------|
| RWCU | 33-FW-0261-04 | Pipe to Pipe | B-F | 90% CRV, 90%
surface | Permanent Hanger
Attachment |



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NINE MILE POINT UNIT 1

Second Interval
Inservice Inspection
Relief Request ISI-5

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel
Class: 1
Component: Reactor Pressure Vessel Bolting

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-G-1, Item B6.10 Closure head nuts - surface examination
Category B-G-1, Item B6.30 Closure head studs - when removed surface and volumetric examination.

3. RELIEF REQUESTED

Relief is requested from the surface examination of the reactor vessel closure head studs and nuts.

4. BASIS FOR RELIEF

The reactor vessel closure head studs and nuts have been Parkerized (corrosion treatment) which renders surface examination results invalid.

5. ALTERNATE EXAMINATION

Visual examination will be performed as an alternative to the code-required surface examination for which relief is requested.

6. PLANT QUALITY AND SAFETY

The examinations as proposed will provide an acceptable level of assurance of the integrity of the reactor vessel closure head studs and nuts.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-6

1. COMPONENT IDENTIFICATION

System: Feedwater
Class: 1
Component Description: Integrally Welded Attachments

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-K-1, Item B10.10 Integrally welded attachments - surface examination.

3. RELIEF REQUESTED

Relief is requested from 100% surface examination of the piping integrally welded attachments listed on the attached table.

4. BASIS FOR RELIEF

The supports listed on the attached were not fully inspected due to limitations of design. These integrally welded support attachment lugs are fillet welded to the piping. The hanger pipe clamp contacts and thus obstructs one edge of the attachment lug on these four (4) supports.

5. ALTERNATE EXAMINATION

No alternate examinations are proposed. Should supports for which relief is requested be dismantled for maintenance during the second inspection interval, the required examination of their welded attachment would be performed then.

To perform the required surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of integrally welded attachment or pressure boundary integrity, or plant safety.



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6. PLANT QUALITY AND SAFETY

The examinations as proposed, together with the required leakage, hydrostatic, and other pressure tests (as required), provide an acceptable level of assurance of integrity of the integrally welded attachment and pressure retaining boundary.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

RELIEF REQUEST ISI-6

| <u>EXAMINATION
AREA</u> | <u>DESCRIPTION</u> | <u>% CRA
EXAMINED</u> | <u>LIMITATION</u> |
|-----------------------------|------------------------------|---------------------------|---|
| 31-H10 A&B | Pipe Support, Welded, 4 Lugs | 90% | Pipe clamp contacts one side of lug, weld lacks surface preparation |
| 31-H12 A&B | Pipe Support, Welded, 4 Lugs | 90% | Pipe clamp contacts one side of lug, weld lacks surface preparation |
| 31-H5 A&B | Pipe Support, Welded, 4 Lugs | 90% | Pipe clamp contacts one side of lug, weld lacks surface preparation |
| 31-H7 A&B | Pipe Support, Welded, 4 Lugs | 90% | Pipe clamp contacts one side of lug, weld lacks surface preparation |



NINE MILE POINT UNIT 1

Second Interval
Inservice Inspection
Relief Request ISI-7

1. COMPONENT IDENTIFICATION

System: Reactor Recirculation
Class: 1
Component: Reactor Recirculation Pumps

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-L-1, Item B12.10, Pump casing welds volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of the suction elbow-to-pump body casing weld in the reactor recirculation pumps.

4. BASIS FOR RELIEF

The geometric configuration of the weld joint, the cast metal of the pump impeller casing and the cast stainless steel of the pump casing inlet elbow preclude meaningful evaluation by ultrasonic examination of this weld.

5. ALTERNATE EXAMINATION

A liquid penetrant examination will be performed on the inlet elbow-to-pump body weld of one pump in the group. Also a visual examination of the internal pressure boundary surfaces will be performed as required by Category B-L-2.

Radiography of pump casing welds would not result in a meaningful examination. Multiple exposures involving multiple film types and speeds would be required due to the complex outside surface at one side (pump side) of the weld, single bevel on the other (casing elbow) side's outside surface, and massive varying wall thickness in base metal of both sides. Even with an extremely active radiographic source, long exposure times would be necessitated by the massive wall thickness. Radiographic examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of pump casing integrity or plant safety.



6. PLANT QUALITY AND SAFETY

The examinations as proposed, together with the required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of pump casing pressure boundary integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



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NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-3

1. COMPONENT IDENTIFICATION

System: Main Steam, Feedwater, Reactor Water
Cleanup, Shutdown Cooling, Emergency
Condenser, Core Spray, Recirculation

Class: 1

Component: Pumps and Valves Exceeding NPS4

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-L-2, Item B12.20, Pump casing - visual, VT-3 examination; B-M-2,
Item B12.50, Valve body, internal surface - visual, VT-3 examination

3. RELIEF REQUESTED

Relief is requested from the requirement to disassemble a pump or valve for the sole purpose of performing a B-L-2 or B-M-2 required examination.

4. BASIS FOR RELIEF

The disassembly of a pump or valve to the degree necessary to inspect the internal surfaces is a major effort and expense involving, in some cases, large personnel exposures.

5. ALTERNATE EXAMINATION

During routine maintenance, a visual examination of the pump or valve body internal surfaces will be performed and documented.

6. PLANT QUALITY AND SAFETY

The examinations as proposed together with the required leakage, hydrostatic and other pressure tests (as applicable) provide an acceptable level of assurance of pump or valve integrity.

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7. RADIATION CONSIDERATIONS

Radiation considerations are a basis only from the standpoint that to disassemble a pump or valve to do an inspection and at a later time disassemble the same pump or valve for maintenance will be approximately double the exposure to personnel than if both the inspection and maintenance were done at the same time.



NINE MILE POINT UNIT 1

Second Interval
Inservice Inspection
Relief Request ISI-9

1. COMPONENT IDENTIFICATION

System: Reactor Pressure Vessel
Class: 1
Component: Control Rod Drive Housing Welds

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

Category B-O, Item B14.10 Welds in CRD Housing - Volumetric or surface examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric or surface examination of all welds in 10% (equal to four (4)) of the peripheral control rod drive housings.

4. BASIS FOR RELIEF

The listed welds cannot be fully inspected due to limitations of design.

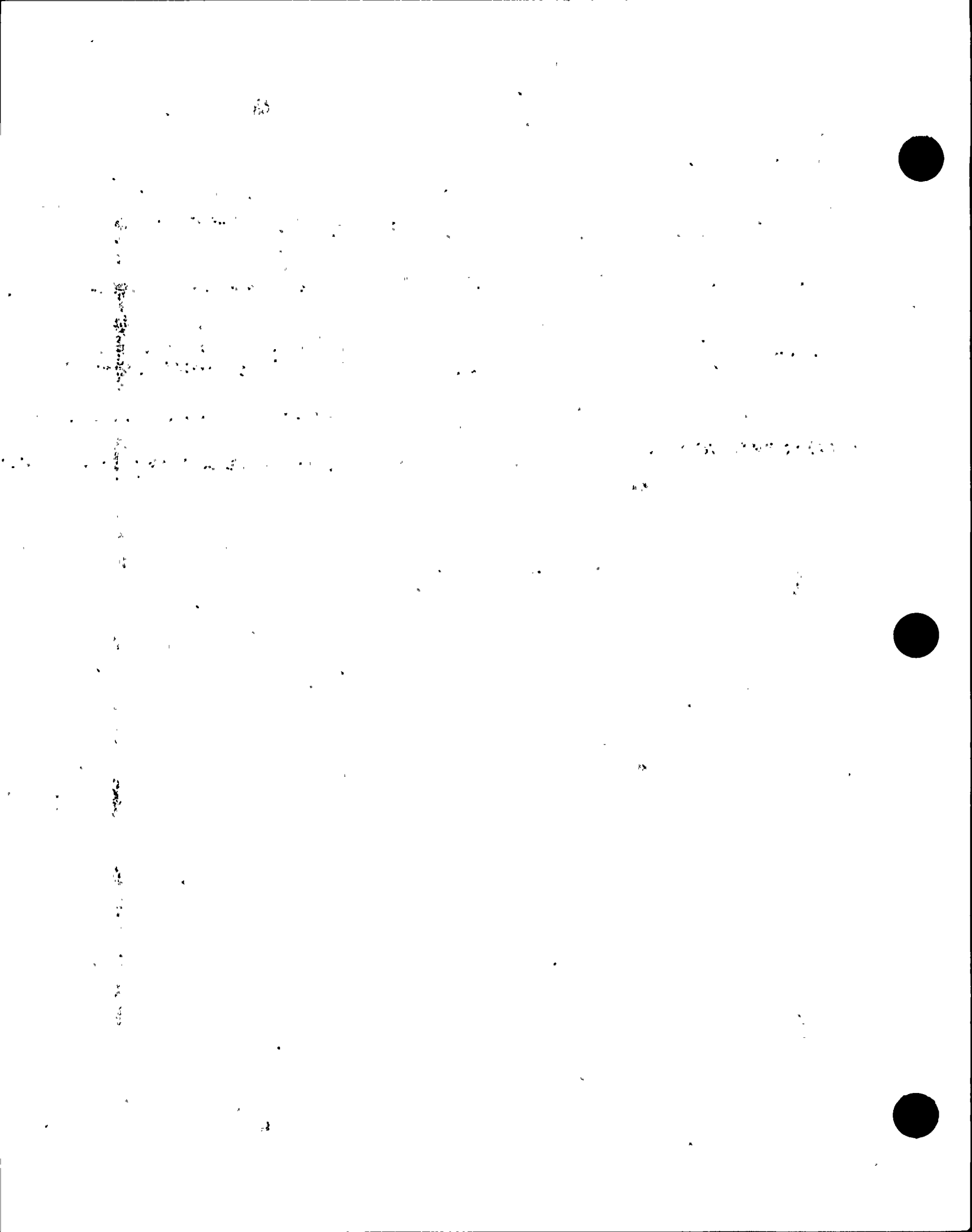
The coverage of each of the four (4) control rod drive housing welds is estimated to be 50%. The housing welds which were partially ultrasonically examined during the first interval are:

RV-CRD-R1 (38-47)
RV-CRD S2 (26-51)
RV-CRD-T3 (50-23)
RV-CRD-U2 (50-35)

A sector of approximately 180° of each housing circumference is obstructed by adjacent housings and their hydraulic lines.

5. ALTERNATE EXAMINATION

Radiographic or surface examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of control rod drive housing weld integrity or plant safety.



Relief Request ISI-9

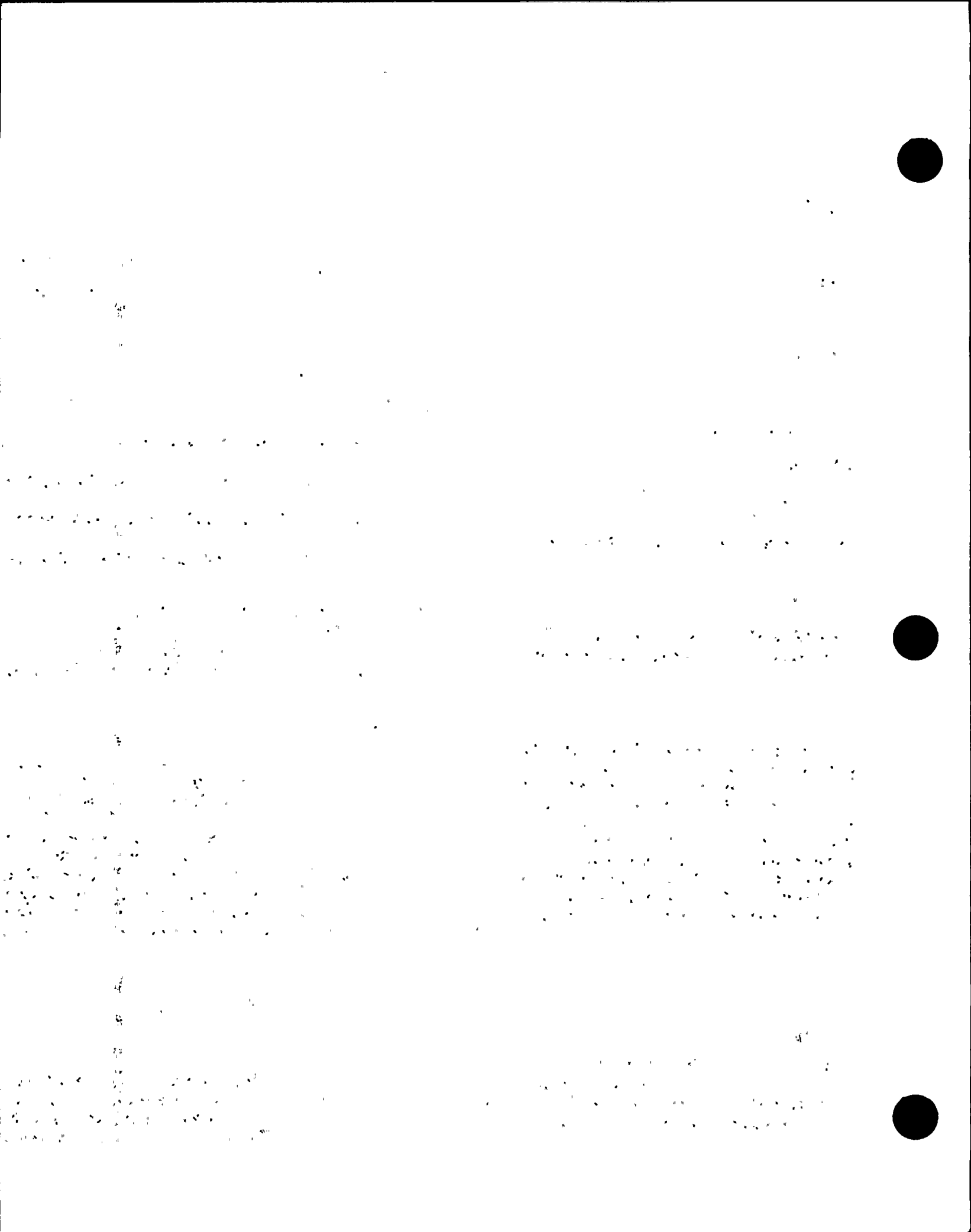
Page 2

6. PLANT QUALITY AND SAFETY

The examinations as proposed, together with the required leakage, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of Control Rod Drive Housing Weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



NINE MILE POINT UNIT 1

Second Interval
Inservice Inspection
Relief Request ISI-10

1. COMPONENT IDENTIFICATION

System: Feedwater
Class: 2
Component Description: Pressure Retaining Welds in Pressure Vessels

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983
Category C-A, Item C1.30 Tubesheet to Shell Weld - volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of the tubesheet to shell weld of one of similar pressure vessels in two (2) groups of feedwater heat exchangers.

4. BASIS FOR RELIEF

The welds listed on the attached cannot be inspected due to limitations of design and geometry. Access to perform in-place vessel ultrasonic examinations was not provided for in the original design. None of the feedwater heat exchanger (heater) dome-to-tube-sheet welds can be examined ultrasonically due to numerous attachments which would obstruct significant portions of the scan paths. Moreover, the geometry of the weld joint (i.e. shell curvature and weld end preparation) has a limiting effect on examination coverage. To produce a specific calibration standard and develop unique ultrasonic techniques in order to examine only partially the required welds, would be an undue hardship. These efforts would not result in a compensating increase in assurance of weld integrity.

5. ALTERNATE EXAMINATION

No alternate examination is proposed.

Radiography as an alternate method is not practical to perform inservice due to the same design and geometric conditions which limit ultrasonic examination. Any examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of vessel weld integrity or plant safety.

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Relief Request ISI-10
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6. PLANT QUALITY AND SAFETY

The required functional, hydrostatic, and other pressure tests (as applicable), provide an acceptable level of assurance of vessel weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

RELIEF REQUEST ISI-10

| <u>SYSTEM</u> | <u>IDENTIFICATION</u> | <u>DESCRIPTION</u> | <u>LIMITATION</u> |
|---------------|-----------------------|--------------------|--|
| FW | HX-30-06-Dome | Dome to Tube Sheet | Tube Plate, 2 Lifting Lugs, 2 Pulling Lugs, Support Saddle & 2--16" Dia. Nozzles |
| FW | HX-51-12-Dome | Dome to Tube Sheet | Tube Plate, 2 Lifting Lugs, 2 Pulling Lugs, Support Saddle & 2--16" Dia. Nozzles |



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Figure 1. Schematic representation of the experimental design. The subjects were divided into two groups: the control group and the experimental group. The control group was divided into two subgroups: the control group and the experimental group. The experimental group was divided into two subgroups: the control group and the experimental group.

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NINE MILE POINT UNIT 1

Second Interval
Inservice Inspection
Relief Request ISI-11

1. COMPONENT IDENTIFICATION

System: Feedwater, Shutdown Cooling
Class: 2
Component Description: Pressure Retaining Nozzle Welds in Vessels

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983.

Category C-B, Item C2.21 Nozzle to Headweld - surface and volumetric examination; Item C2.22 Nozzle Inside Radius sections - volumetric examination.

3. RELIEF REQUESTED

Relief is requested from volumetric examination of nozzle-to-vessel attachment welds and nozzle inside radius section, of one of similar pressure vessels in two groups of heat exchangers.

4. BASIS FOR RELIEF

The shutdown cooling and high pressure feedwater heat exchangers inlet and outlet nozzles are fillet welded to the pressure vessel. Fillet welds cannot be ultrasonically tested and provide meaningful examination data.

5. ALTERNATE EXAMINATION

A surface examination will be performed on the four nozzle to vessel welds.

Radiography as an alternate method is not practical to perform inservice and would result in an undue burden without a compensating increase in assurance of nozzle weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

- ^ The examinations as proposed, together with the required functional, hydrostatic and other pressure tests (as applicable), provide an acceptable level of assurance of nozzle weld integrity.

7.- RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

RELIEF REQUEST ISI-11

| CODE CATEGORY
<u>ITEM</u> | <u>SYSTEM</u> | <u>IDENTIFICATION</u> | <u>DESCRIPTION</u> | <u>LIMITATION</u> |
|------------------------------|---------------|-----------------------|---------------------------------|---|
| C2.21 | FW | HX-30-06-IN | Nozzle to Dome | Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld |
| C2.22 | FW | HX-30-06-IN-IR | Nozzle Inside Radius Section | Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld |
| C2.21 | FW | HX-30-06-ON | Nozzle to Dome | Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld |
| C2.22 | FW | HX-30-06-ON-IR | Nozzle Inside Radius Section | Fillet weld configuration, 3/4" NPS Socket weld, 1 1/2" NPS Socket Weld |
| C2.21 | SC | HX-38-12-IN | Nozzle to Heat Exchanger Inlet | Fillet weld configuration |
| C2.21 | SC | HX-38-12-OUT | Nozzle to Heat Exchanger Outlet | Fillet weld configuration |



NINE MILE-POINT UNIT 1

Second Interval Inspection Inservice Inspection Relief Request ISI-12

1. COMPONENT IDENTIFICATION

System: RPV Head Spray and Vent, Core Spray
Class: Augmented Class 1
Component Description: Nonconforming Service Sensitive Piping Welds

2. AUGMENTED INSERVICE INSPECTION GUIDELINES OF NUREG 0313

Revision 1, July 1980

Class 1 piping welds require volumetric and surface examination.

3. RELIEF REQUESTED

Relief is requested from 100% volumetric and surface examination of nonconforming service sensitive piping welds.

4. BASIS FOR RELIEF

The welds listed on the attached cannot be fully inspected by ultrasonic and/or surface methods due to limitations of design, geometry, and material of construction.

The dendritic weld structure of the stainless steel material can result in both sound redirection and attenuation phenomena which limit ultrasonic interrogation. Thus, such welds necessitate examination from both sides in order to be fully examined. In particular, non-parallel surfaces and product form of the material of valves preclude meaningful ultrasonic examination from the valve side.

Twenty-nine (29) stainless steel welds were limited by fitting configuration, thirteen (13) primarily by permanent attachment to the piping, eight (8) by containment penetrations, and one (1) by adjacent piping. The percentage of Code Required Area (CRA) and Code Required Volume (CRV) that can be examined is tabulated with the nature of the obstruction on the attached.

5. ALTERNATE EXAMINATION

No alternate examination is proposed. The required surface examination will be performed on all accessible welds.



Radiography of fitting welds would not result in a meaningful examination, due to double wall elliptical exposures that would be required from the outside surfaces. Multiple exposures would be necessary for complete coverage and would compound difficulties in evaluating results. There is no access to perform an alternate examination of the welds inside the containment penetration sleeve. Radiographic examination additional to examinations performed would result in an undue burden without a compensating increase in assurance of nonconforming service sensitive piping weld integrity or plant safety.

6. PLANT QUALITY AND SAFETY

The examinations as proposed, together with the required, leakage, hydrostatic and other pressure tests (as applicable) provide an acceptable level of assurance of nonconforming service sensitive piping weld integrity.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

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RELIEF REQUEST ISI-12

| <u>SYSTEM</u> | <u>EXAMINATION
AREA</u> | <u>DESCRIPTION</u> | <u>REQUIRED
METHOD</u> | <u>EXTENT
EXAMINED</u> | <u>LIMITATION</u> |
|---------------|-----------------------------|----------------------|----------------------------|----------------------------|---|
| RPV HS&V | P-34-FW-12 | Pipe to Elbow | PT | 95% CRA | Permanent Hanger Attachment |
| RPV HS&V | P-34-FW-17 | Valve 34-01 to Pipe | PT | None | Inaccessible at Penetration |
| CS | 40-FW-10 | Tec to Valve 40-10 | UT PT | 48% CRV | Fitting Configuration, Material |
| CS | 40-FW-16 | Valve 40-12 to Pipe | UT PT | None | Inaccessible at Penetration |
| CS | 40-FW-16-D | Pipe Seam | UT PT | None | Inaccessible inside Penetration |
| CS | 40-FW-17 | Elbow to Valve 40-12 | UT PT | 58% CRV | Fitting Configuration |
| CS | 40-FW-18 | Valve 40-13 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-21 | Valve 40-06 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-24 | Valve 40-09 to Elbow | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-25 | Pipe to Valve 40-09 | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-26 | Valve 40-01 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-27 | Tee to Valve 40-01 | UT PT | 89% CRV | Fitting Configuration, Material |
| CS | 40-FW-2A | Pipe to Pipe | UT PT | 88% CRV | Permanent Hanger Attachment |
| CS | 40-FW-2A-U | Pipe Seam | UT PT | 88% CRA & CRV | Permanent Hanger Attachment |
| CS | 40-FW-30 | Valve 40-02 to Pipe | UT PT | None | Inaccessible at Penetration |
| CS | 40-FW-31 | Elbow to Valve 40-02 | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-32 | Valve 40-03 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-33 | Pipe to Flange | UT PT | 75% CRV | Fitting Configuration |
| CS | 40-FW-34 | Valve 40-05 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-34A | Pipe to Elbow | UT PT | 66% CRV | Permanent Hanger Interference |
| CS | 40-FW-5 | Tee to Pipe | UT PT | 86% CRV | Fitting Configuration |
| CS | 40-FW-5-D | Pipe Seam | UT PT | No UT | Permanent Hanger Attachment |
| CS | 40-FW-55 | Pipe to Pipe | UT PT | 82% CRV | Permanent Hanger Interference |
| CS | 40-FW-7 | Valve 40-11 to Elbow | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-8 | Pipe to Valve 40-11 | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-9 | Valve 40-10 to Pipe | UT PT | 58% CRV | Fitting Configuration, Material |
| CS | 40-FW-9-D | Pipe Seam | UT PT | None | Permanent Hanger Attachment |
| CS | 40-SW-36B | Elbow to Nozzle | UT PT | 58% CRV | Fitting Configuration |
| CS | 40-SW-36C | Nozzle to Pipe | UT PT | No UT | Fitting Configuration |
| CS | 40-SW-37A | Elbow to Pipe | UT PT | None | Obstructed by Penetration |
| CS | 40-SW-37A-U | Pipe Seam | UT PT | None | Inaccessible inside Penetration |
| CS | 40-SW-37A-D | Elbow Seam | UT PT | 66% CRV | Fitting Configuration, Permanent
Hanger Attachment |



RELIFE REQUEST ISI-12

Page 4

| <u>SYSTEM</u> | <u>EXAMINATION
AREA</u> | <u>DESCRIPTION</u> | <u>REQUIRED
METHOD</u> | <u>EXTENT
EXAMINED</u> | <u>LIMITATION</u> |
|---------------|-----------------------------|--------------------|----------------------------|----------------------------|---------------------------------|
| CS | 40-SW-39C | Pipe to Tee | UT PT | 89% CRV | Fitting Configuration |
| CS | 40-SW-39E | Pipe to Elbow | UT PT | 84% CRV | Permanent Hanger Attachment |
| CS | 40-SW-39F | Elbow to Pipe | UT PT | None | Permanent Hanger Attachment |
| CS | 40-SW-40B | Tee to Pipe | UT PT | 89% CRV | Fitting Configuration |
| CS | 40-SW-40C | Pipe to Tee | UT PT | 98% CRV | Fitting Configuration |
| CS | 40-SW-40D | Pipe to Tee | UT PT | 86% CRV | Fitting Configuration |
| CS | 40-SW-40E-D | Pipe Seam | UT PT | 67% CRV | Obstructed by Adjacent Piping |
| CS | 40-SW-45C | Nozzle to Pipe | UT PT | No UT | Fitting Configuration |
| CS | 40-SW-45D | Pipe to Nozzle | UT PT | 75% CRV | Fitting Configuration |
| CS | 40-SW-46A | Pipe to Elbow | UT PT | None | Obstructed by Penetration |
| CS | 40-SW-46A-U | Pipe Seam | UT PT | None | Inaccessible inside Penetration |
| CS | 40-SW-48A | Pipe to Elbow | UT PT | 92% CRV | Obstructed by 4 Lugs |
| CS | 40-SW-48A-U | Pipe Seam | UT PT | None | Permanent Hanger Attachment |
| CS | 40-SW-49A | Pipe to Tee | UT PT | 96% CRV | Fitting Configuration |
| CS | 40-SW-49A-U | Pipe Seam | UT PT | 90% CRV | Permanent Hanger Attachment |
| CS | 40-SW-49B | Tee to Pipe | UT PT | 79% CRV | Fitting Configuration |
| CS | 40-SW-49B-D | Pipe Seam | UT PT | 66% CRV | Obstructed by Lug |
| CS | 40-SW-51C | Pipe to Tee | UT PT | 94% CRV | Fitting Configuration |
| CS | 40-SW-51D | Pipe to Tee | UT PT | 86% CRV | Fitting Configuration |



NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-13

1. COMPONENT IDENTIFICATION

System: Closed Loop Cooling, Condensate Storage and Transfer, Sealing Water

Class: 2 and 3

Component: Non-isolatable portions of Class 2 and Class 3 Piping Systems

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

IWA-5000, IWC-5222, and IWD-5223 System Hydrostatic Test.

3. RELIEF REQUESTED

Relief is requested from the requirement to hydrostatically test at elevated pressure the portions of piping systems identified as non-isolatable. These portions of NI-ISI-HYD-70/70.1 are Blocks 11 and 13 and the Reactor Cleanup Non-regenerative Heat Exchanger secondary side and its associated piping and Block 3 of NI-ISI-HYD-57/91.

4. BASIS FOR RELIEF

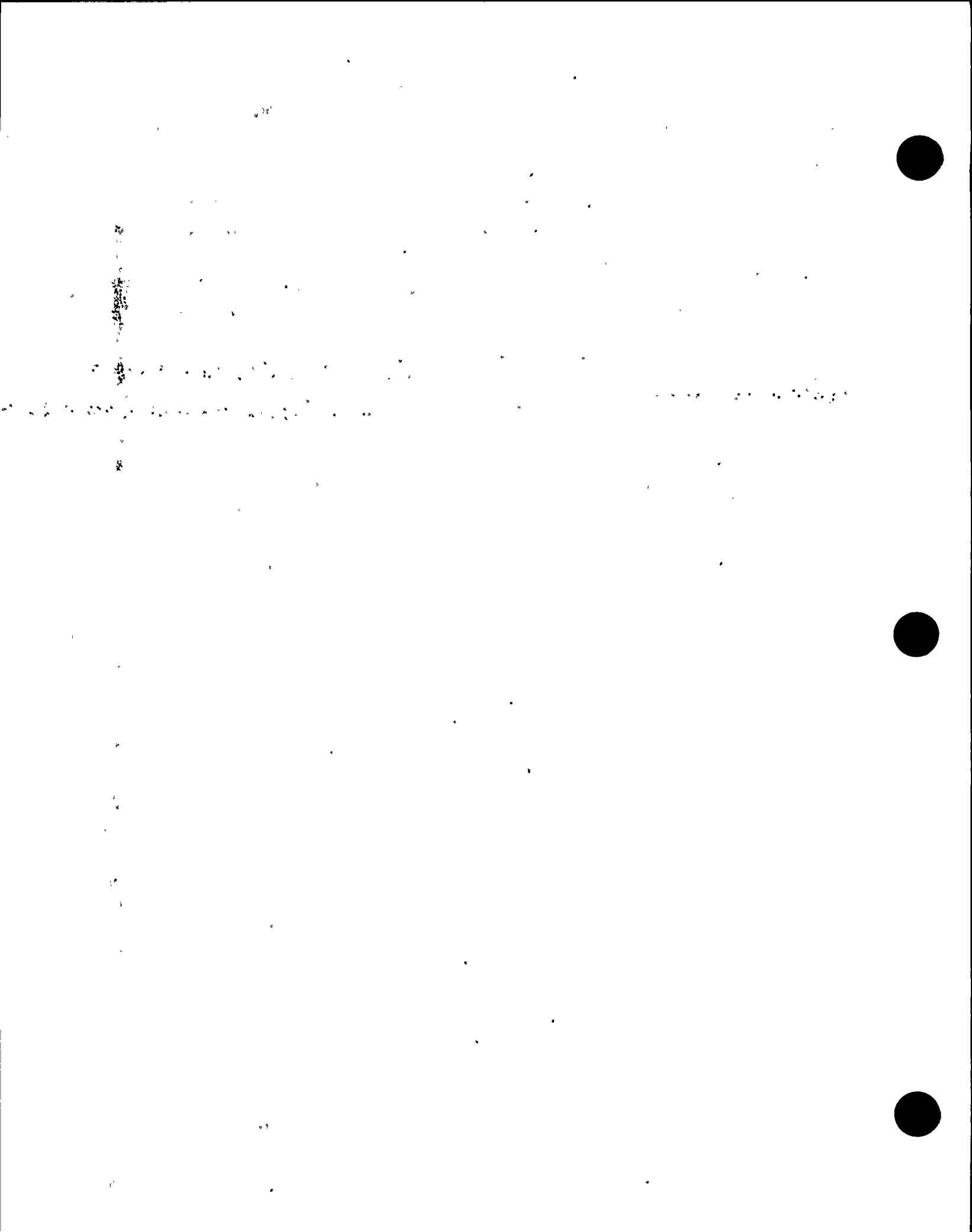
These system portions will not be tested at the hydrostatic test pressure due to the unisolatable single discharge header and the uninterruptable service requirements for cooling of plant safety related equipment, it is impractical and unsafe to isolate these portions for hydrostatic pressure testing.

5. ALTERNATE EXAMINATION

A visual VT-2 examination will be performed on these components at normal operating pressure upon verification of flow from pump discharges.

6. PLANT QUALITY AND SAFETY

The examinations as proposed provide an acceptable level of assurance of piping system integrity. Should the plant be modified to install additional headers

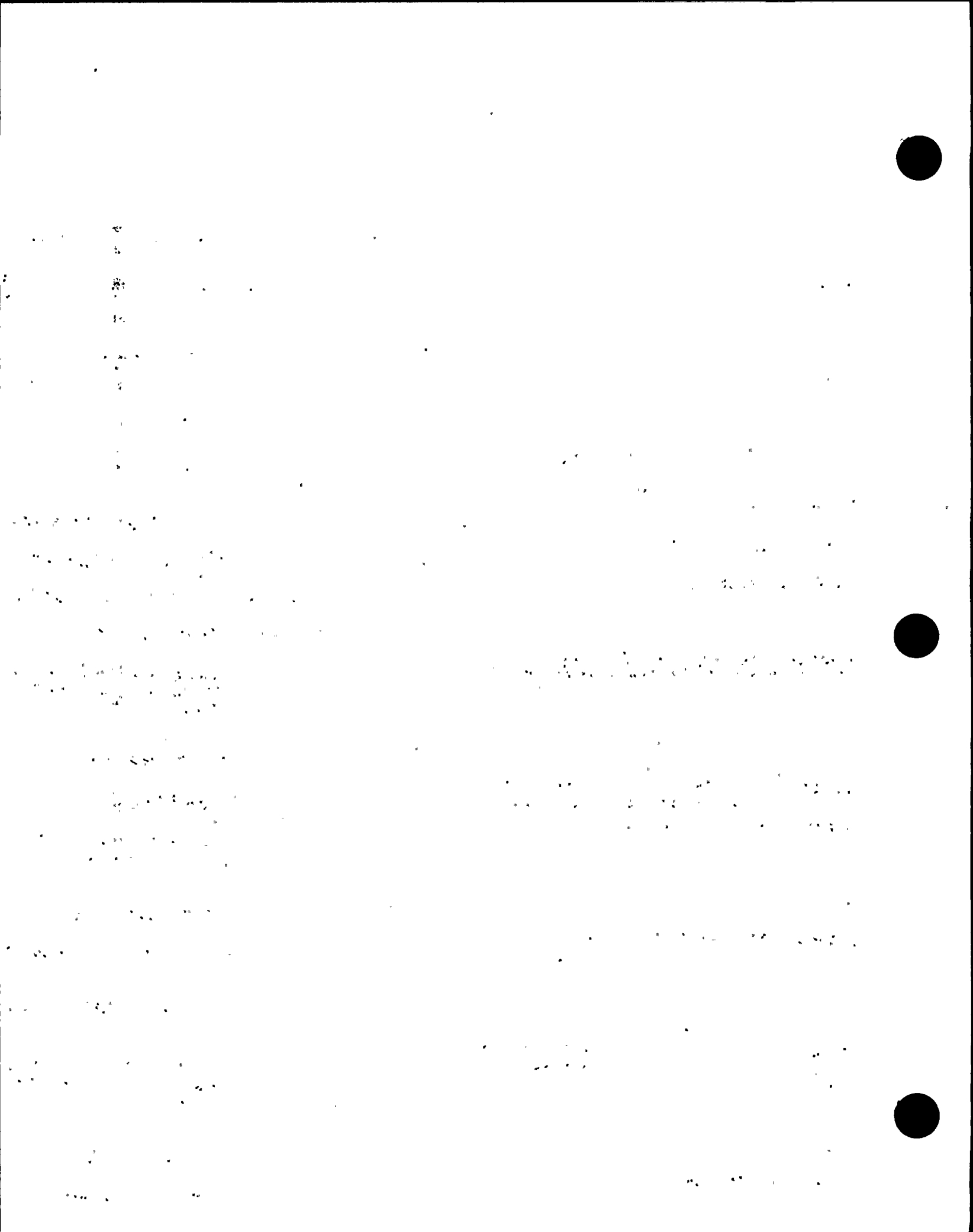


Relief Request ISI - 13
Page 2

allowing isolation of associated components of these blocks, hydrostatic pressure testing during plant operation could be conducted safely.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



9.12 BLOCK 11 RCLC (DWGS C-18011-C Sheet 2 and 4, C-26949-C,
C-18005-C Sheet 1. Figures - 1A, 1F, 1L, 1N & 1Q.

9.12.1 Close or verify closed valve RCLC-323 (C-18011-C Sheet 2) _____

9.12.2 Open or verify open valve RCLC-129 _____

9.12.3 Close or verify closed valve RCLC-721 _____

9.12.4 Close or verify closed valve RCLC-325 _____

9.12.5 Close or verify closed valve RCLC-719 _____

9.12.6 Close or verify closed valve RCLC-321 _____

9.12.7 Open or verify open RCLC inlet valve to Inst. Air Comp.
#11 Intercooler. _____

9.12.8 Close or verify closed valve RCLC-717 _____

9.12.9 Open or verify open valve TCV-94-07 _____

9.12.10 Open or verify open valve RCLC-127 _____

9.12.11 Open or verify open valve 94-09 _____

* Requires independent verification



| 9.12 | <u>BLOCK 11</u> RCLC (DWGS C-18011-C Sheet 2 and 4, C-26949-C,
C-18005-C Sheet 1. Figures - 1A, 1F, 1L, 1N & 1Q.
(Cont'd) | <u>INITIALS</u> |
|---------|---|-----------------|
| 9.12.12 | Open or verify open valve RCLC-123 | _____ |
| 9.12.13 | Open or verify open valve RCLC-119 | _____ |
| 9.12.14 | Open or verify open valve RCLC-121 (Inst. Air Comp. #11) | _____ |
| 9.12.15 | Open or verify open valve RCLC-121 (Inst. Air Comp. #12) | _____ |
| 9.12.16 | Close or verify closed valve RCLC-324 | _____ |
| 9.12.17 | Close or verify closed valve RCLC-722 | _____ |
| 9.12.18 | Close or verify closed valve RCLC-326 | _____ |
| 9.12.19 | Close or verify closed 70-288 | _____ |
| 9.12.20 | Close or verify closed 70-287 | _____ |
| 9.12.21 | Close or verify closed valve RCLC-720 | _____ |
| 9.12.22 | Close or verify closed valve RCLC-322 | _____ |
| 9.12.23 | Open or verify open RCLC inlet valve to Inst. Air
Comp. #12 Intercooler. | _____ |
| 9.12.24 | Close or verify closed valve RCLC-718 | _____ |
| 9.12.25 | Open or verify open valve TC-94-08 | _____ |
| 9.12.26 | Open or verify open valve RCLC-120 | _____ |
| 9.12.27 | Open or verify open valve 94-10 | _____ |
| 9.12.28 | Open or verify open valve RCLC-116 | _____ |
| 9.12.29 | Open or verify open valve RCLC-112 | _____ |
| 9.12.30 | Open or verify open valve RCLC-114 | _____ |
| 9.12.31 | Open or verify open valve RCLC-150 (C-18022-C, Sheet 4) | _____ |
| 9.12.32 | Open or verify open valve 70-286 | _____ |
| 9.12.33 | Close or verify closed valve 70-74 | _____ |
| 9.12.34 | Open or verify open valve RCLC-151 | _____ |
| 9.12.35 | Close or verify closed valve 70-73 | _____ |
| 9.12.36 | Open or verify open valve 70-285 | _____ |
| 9.12.37 | Open or verify open valve 70-225 | _____ |

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| 9.12 | <u>BLOCK 11</u> RCLC (DWGS C-18011-C Sheet 2 and 4, C-26949-C,
C-18005-C Sheet 1. Figures - 1A, 1F, 1L, 1N & 1Q.
(Cont'd) | <u>INITIALS</u> |
|---------|---|-----------------|
| 9.12.38 | Open or verify open valve 70-224 | _____ |
| 9.12.39 | Open or verify open valve RCLC-71 (C-18022-C, Sheet 2) | _____ |
| 9.12.40 | Open or verify open valve RCLC-73 | _____ |
| 9.12.41 | Open or verify open valve RCLC-RFW-74 | _____ |
| 9.12.42 | Open or verify open valve RCLC-RFW-72 | _____ |
| 9.12.43 | Open or verify open valve RCLC-RWF-77 | _____ |
| 9.12.44 | Open or verify open valve RCLC-RWF-75 | _____ |
| 9.12.45 | Open or verify open RCLC outlet valve (CS-G-4) from
RFP #12 Jacket. | _____ |
| 9.12.46 | Open or verify open RCLC inlet valve (CS-G-4) to
RFP # 12 Jacket. | _____ |
| 9.12.47 | Open or verify open valve FW-31B | _____ |
| 9.12.48 | Close or verify closed valve FW-31A | _____ |
| 9.12.49 | Open or verify open RCLC outlet valve (BR-CO-4)
from RFP #12 oil cooler | _____ |
| 9.12.50 | Open or verify open RCLC inlet valve (BR-G-4)
to RFP #12 oil cooler | _____ |
| 9.12.51 | Open or verify open RCLC outlet valve (CS-G-4) from RFP
#11 Jacket | _____ |
| 9.12.52 | Open or verify open RCLC inlet valve (CS-G-4) to RFP
#11 Jacket | _____ |
| 9.12.53 | Open or verify open valve FW-67B | _____ |
| 9.12.54 | Close or verify closed valve FW-67A | _____ |
| 9.12.55 | Open or verify open RCLC outlet valve (BR-CO-4) from
RFP #11 oil cooler. | _____ |
| 9.12.56 | Open or verify open RCLC inlet valve (BR-G-4) to
RFP #11 oil cooler. | _____ |
| 9.12.57 | Open or verify open valve RCLC-159 | _____ |
| 9.12.58 | Open or verify open valve CP-13 (C-18022-C, Sheet 2) | _____ |

9.12 BLOCK 11 RCLC (DWGS C-18011-C Sheet 2 and 4, C-26949-C, INITIALS
C-18005-C Sheet 1. Figures - 1A, 1F, 1L, 1N & 1Q.
(Cont'd)

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|---------|--|-------|
| 9.12.59 | Open or verify open valve CP-15 | _____ |
| 9.12.60 | Open or verify open valve CP-10 | _____ |
| 9.12.61 | Open or verify open valve CP-12 | _____ |
| 9.12.62 | Open or verify open valve CP-17 | _____ |
| 9.12.63 | Open or verify open valve CP-19 | _____ |
| 9.12.64 | Open or verify open valve RCLC-158 | _____ |
| 9.12.65 | Open or verify open valve 70-228 (C-26949-C) | _____ |
| 9.12.66 | Open or verify open valve 70-230 | _____ |
| 9.12.67 | Open or verify open valve 70-210 | _____ |
| 9.12.68 | Open or verify open valve 70-204 | _____ |
| 9.12.69 | Open or verify open valve BV-70-212 | _____ |
| 9.12.70 | Open or verify open valve 70-205 | _____ |
| 9.12.71 | Open or verify open valve 70-207 | _____ |
| 9.12.72 | Remove test connection cap at valve RCLC-323 (C-18011-C, Sheet 2) | _____ |
| 9.12.73 | Connect Hydrostatic test pump at valve RCLC-323 | _____ |
| 9.12.74 | Connect Hydrostatic test pump to available service air supply. | _____ |
| 9.12.75 | Connect Hydrostatic test pump to available demineralized or condensate water supply. | _____ |
| 9.12.76 | Open demineralized or condensate water supply and vent Hydrostatic test pump. | _____ |
| 9.12.77 | Open service air supply to hydrostatic test pump. | _____ |
| 9.12.78 | Open valve RCLC-323. | _____ |
| 9.12.79 | Pressurize Block 11 to 140 PSIG. | _____ |

NOTE: The test pressure shall be maintained throughout the VT-2 examination. The Hydrostatic test pump may be operated as required to maintain pressure.

9.12 BLOCK 11 RCLC (DWGS C-18011-C Sheet 2 and 4, C-26949-C, INITIALS (
C-18005-C Sheet 1. Figures - 1A, 1F, 1L, 1N & 1Q.
(Cont'd)

9.12.80 Verify completion of at least 10 minutes hold time at test pressure prior to commencing the VT-2 examination. _____

9.12.81 Perform the VT-2 examination. The VT-2 examination shall be performed by a certified VT-2 examiner in conjunction with a NMPC-QA approved nondestructive examination procedure. Inspect the entire boundary as shown in Figures 1A, 1F, 1L, 1N & 1Q and record all leakage on the Leak Identification Data Sheet (Attachment 1, Block 11). _____

9.12.82 Stop the hydrostatic test pump. _____

9.12.83 Close water and air supply to hydrostatic test pump vent. _____

9.12.84 Depressurize system using hydrostatic test pump vent. _____

9.12.85 Close valve RCLC-323. _____ / *

9.12.86 Disconnect Hydrostatic test pump _____

9.12.87 Replace test connection cap at valve RCLC-323. _____ / *

N1-ISI-HYD-70/70.1 -26 May 1986

[illegible]

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9.14 BLOCK 13 (Figures 1B, 1C, 1E, 1H, 1L, 1M, 1N and 10)
(RCLC, Non-Isolatable Portions) (Cont'd)

INITIALS

- 9.14.6 Verify RCLC Flow has been established through:
Spent fuel pool storage and filtering system heat
exchangers #11 and #12, Waste Disposal System
Concentrated Waste Tank #11, Control Room HVAC
Chiller Condensers, Rx, Sampling System Cooling
Coil, Rx. Clean-up Filter Precoat Cooler, Rx.
Clean-up Aux. Pump, Rx. Clean-up Non-Regen Ht.
Exchs., Rx. Clean-up Pump # 11 and #12, Rx.
Clean-up Sludge Tank Blower After Cooler, Rx.
Clean-up Filter Precoat Cooler, Rx. Building
Equipment Drain Tank Cooling Coil, and through
associated RCLC Suction and Discharge Piping,
for a minimum of 10 minutes prior to performing
the VT-2 examination.

NOTE: Flow through Block 13 associated components
shall be maintained essentially constant
throughout the entire VT-2 visual examination.

- 9.14.7 Record RCLC pump discharge pressure, as shown on
0-200 PSIG test gauge _____ PSIG. **
- 9.14.8 Perform the VT-2 examination. The VT-2 examination
shall be performed by a certified VT-2 examination
personnel in conjunction with a NMPC-QA approved
nondestructive examination procedure. Inspect the
entire pressure boundaries as shown on Figures 1B,
C, E, H, L, M, N, and O and record all leakage on the
Leak Identification Data Sheet (Attachment 1, Block 13).
- 9.14.9 Secure RBCLC pump.
- 9.14.10 Isolate 0-200 PSIG test gauge.
- 9.14.11 Remove 0-200 PSIG test gauge.
- 9.14.12 Reinstall PI-70-____. / *
- 9.14.13 Open isolation valve for PI-70-____. / *
- 9.14.14 Notify SSS of the completion of this procedure and of any
reportable conditions.
- 9.14.15 Restore the RCLC system to normal in accordance with
OP-11 and OP-24 for existing plant conditions. / *

* Requires independent verification.

** See notes under section 10.0 of this procedure.

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10.0 GENERAL COMMENTS/RECOMMENDATIONS

10.1 This hydrostatic pressure test is performed in accordance with IWC-5222(a) and IWD-5223(a) of the ASME B&PV code, Section XI, 1980 Edition through Winter 1981 addenda.

10.2 Due to the unisolable single discharge header and the un-interruptable service requirement for plant safety systems, the common discharge header piping and components are hydrostatically tested at R/B cooling pump discharge pressure. A plant mod. is required to utilize the installation of a second discharge header to meet the hydrostatic testing requirement and/or maintenance purposes.

CORRECTIVE ACTION REQUIRED:

- a. ☐ NONE
b. ☐ WORK REQUEST # _____
c. ☐ OTHER (EXPLAIN)

HYDROSTATIC TEST PERFORMED BY:

INITIALS

NAME (PRINT)

INITIALS

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NAME (PRINT)

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NAME (PRINT)

INITIALS

NAME (PRINT)

HYDROSTATIC TEST HAS BEEN SATISFACTORILY COMPLETED:

SSS

HYDROSTATIC TEST HAS NOT BEEN SATISFACTORILY COMPLETED:

SSS

ISI REVIEW BY: _____ DATE _____

CORRECTIVE ACTION REQUIRED: _____

10.0 GENERAL COMMENTS/RECOMMENDATIONS

- 10.1 This hydrostatic pressure test is performed in accordance with IWC-5222(a) and IWD-5223(a) of the ASME B&PV code, Section XI, 1980 Edition through Winter 1981 addenda.
- 10.2 Due to the unisolable single discharge header and the un-interruptable service requirement for plant safety systems, the common discharge header piping and components are hydrostatically tested at R/B cooling pump discharge pressure. A plant mod. is required to utilize the installation of a second discharge header to meet the hydrostatic testing requirement and/or maintenance purposes.

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- 9.4 BLOCK 3 (Figure 1A, 1B, 1C, and 1D, Condensate Transfer Header)
- 9.4.1 Close or verify closed valve 57-09 _____
- 9.4.2 Close or verify closed valve 57-10 _____
- 9.4.3 Close or verify closed valve CT-11 _____
- 9.4.4 Open or verify open valve 57-16 _____
- 9.4.5 Close or verify closed valve CT-12 _____
- 9.4.6 Open or verify open valve 57-15 _____
- 9.4.7 Close or verify closed valve SSS-G-3 (1) _____
- 9.4.8 Close or verify closed valve SSS-G-3 (2) _____
- 9.4.9 Close or verify closed valve 60-02 _____
- 9.4.10 Close or verify closed valve 60-01 _____
- 9.4.11 Close or verify closed valve 57-41 _____
- 9.4.12 Close or verify closed valve 50-66 _____
- 9.4.13 Open or verify open valve 57-56 _____
- 9.4.14 Open or verify open valve CT-77 _____
- 9.4.15 Open or verify open valve BR-G-3 (C-18036) _____
- 9.4.16 Close or verify close valve BR-G-3 _____
- 9.4.17 Open or verify open valve PCV-91-11 _____
- 9.4.18 Close or verify closed valve BR-G-3 _____
- 9.4.19 Close or verify closed valve BR-G-6 (CT-90) _____
- 9.4.20 Open or verify open valve CT-89 _____
- 9.4.21 Open or verify open PCV-91-15 _____
- 9.4.22 Close or verify closed CT-88 _____
- 9.4.23 Close or verify closed CT-181 _____
- 9.4.24 Open or verify open CT-179 _____
- 9.4.25 Open or verify open PCV-91-112 _____
- 9.4.26 Close or verify closed CT-180 _____



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9.4 BLOCK 3 Figure (1A, 1B, 1C and 1D) (Cont'd)

- 9.4.27 Close or verify closed valve CT-100 (C-18036)

9.4.28 Close or verify closed valve 57-35.

9.4.29 Open or verify open valve 57-65

9.4.30 Close or verify closed valve 57-64

9.4.31 Close or verify closed valve 57-66

9.4.32 Close or verify closed valve CT-37

9.4.33 Close or verify closed valve CT-38

9.4.34 Close or verify closed valve CT-76

9.4.35 Close or verify closed valve CT-75

9.4.36 Close or verify closed valve CT-74

9.4.37 Open or verify open valve CT-33

9.4.38 Close or verify closed valve BV-57.1-01

9.4.39 Close or verify closed valve CT-35

9.4.40 Open or verify open valve 57-36

9.4.41 Open or verify open valve BV-57-27

9.4.42 Open or verify open valve BV-57-26

9.4.43 Close or verify closed valve 54-76

9.4.44 Close or verify closed valve CT-29

9.4.45 Open or verify open valve 57-37

9.4.46 Close or verify closed valve CT-47

9.4.47 Close or verify closed valve CT-49

9.4.48 Close or verify closed valve CT-50

9.4.49 - Close or verify closed valve CT-52

9.4.50 Open or verify open valve CT-53

9.4.51 Close or verify closed valve BV-57-103

9.4.52 Close or verify closed valve BV-57-104

9.4.53 Close or verify closed valve 54-76

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100.

9.4 BLOCK 3 Figure (1A, 1B, 1C and 1D) cont'd

9.4.54 Close or verify closed valve CT-100-51 _____

9.4.55 Connect Hydrostatic Test Pump at Isolation Valves
for PI-57-42 and PI-57-19. _____

9.4.56 Connect Hydrostatic Test Pump to Service Air Supply. _____

9.4.57 Connect Hydrostatic Test Pump to Condensate Water
Supply. _____

9.4.58 Vent Hydrostatic Test Pump. _____

9.4.59 Open Isolation Valves for PI-57-42 and 57-19 and
Pressurize System to 165 PSIG. _____

NOTE: Hydrostatic Test Pump may be operated as
required to maintain test pressure.

9.4.60 Verify completion of 10 minute hold time. _____

NOTE: System shall remain pressurized for duration
of VT-2 Examination.

9.4.61 Perform the VT-2 Examination. The VT-2 Examination shall
be performed by a certified VT-2 Examiner in conjunction
with any NMPC-QA approved Nondestructive Examination
Procedures. Inspect the entire boundary as shown in
Figure 1A, 1B, 1C and 1D and record all leakage on the Leak
Identification Data Sheet (Attachment 1). _____

9.4.62 Stop Hydrostatic Test Pump. _____

9.4.63 Close Hydrostatic Test Pump Service Air Supply. _____

9.4.64 Close Hydrostatic Test Pump Condensate Water Supply. _____

9.4.65 Depressurize System using Hydrostatic Test Pump
Vent Valve. _____

9.4.66 Close Isolation Valves for PI-57-42 and PI-57-19. _____

9.4.67 Disconnect Hydrostatic Test Pump and associated
equipment. _____

9.4.68 W.R. written to reconnect PI-57-42. WR NO. _____

9.4.69 W.R. written to reconnect PI-57-19. WR NO. _____

9.4.70 Restore Condensate Storage and Transfer System to
normal for existing plant conditions per NI-OP-15B. _____

9.4.71 Notify SSS of any reportable conditions and the
completion of this Hydrostatic Test. _____

NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-14

1. COMPONENT IDENTIFICATION

System: Fuel Pool Cooling
Class: 3
Component: Fuel Pool Cooling System Piping

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983
IWA-5000 and IWD-5223 System Hydrostatic Test.

3. RELIEF REQUESTED

Relief is requested from the requirement to hydrostatically test at elevated pressure that portion of the Fuel Pool Cooling System identified as Block 1 of NI-ISI-HYD-54.

4. BASIS FOR RELIEF

This portion of piping will be tested at a reduced pressure to avoid over-pressurizing the gaskets of the filters (11) 54-03 and (12) 54-06. Over-pressurization of the filter gaskets would cause leakage and spread contamination in the plant.

5. ALTERNATE EXAMINATION

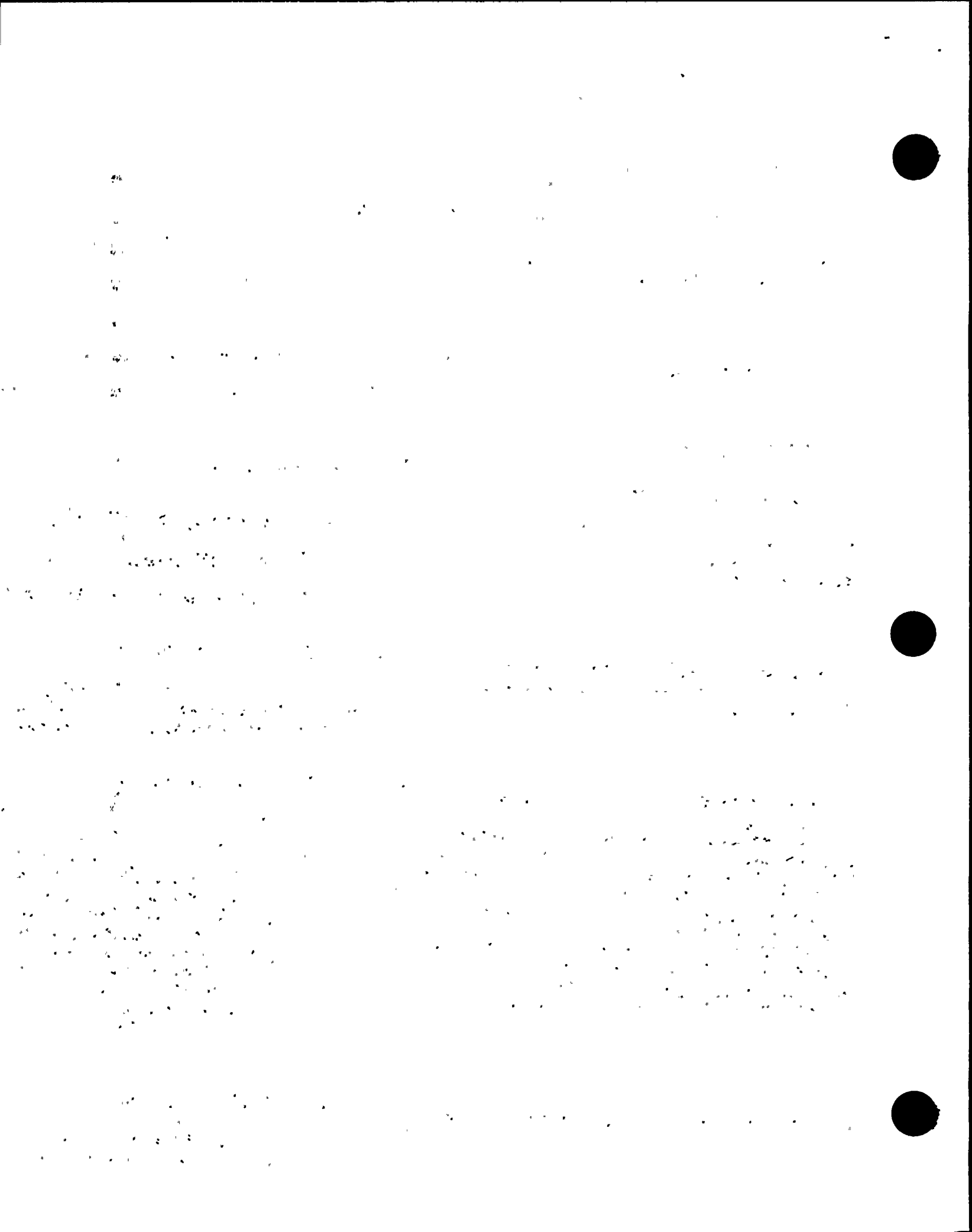
The hydrostatic test will be performed on these portions at 75 psig.

6. PLANT QUALITY AND SAFETY

The examination as proposed provides an acceptable level of assurance of piping system integrity. Should the plant be modified at a later date to allow higher pressures at the fuel pool cooling filters or to by-pass the filters, hydrostatic pressure testing during plant operation could be conducted safely.

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.



- 9.0 PROCEDURE
- 9.1 SSS Permission obtained to perform this hydrostatic test. _____
- 9.2 BLOCK 1 (Figure 1A)
- 9.2.1 Close or verify closed valve BV-54-18 _____
- 9.2.2 Close or verify closed valve 54-47 _____
- 9.2.3 Open or verify open valve BV-54-17 _____
- 9.2.4 Close or verify closed valve FP-709 _____
- 9.2.5 Open or verify open valve FP-708 _____
- 9.2.6 Open or verify open valve 54-55 _____
- 9.2.7 Close or verify closed valve FP-301 _____
- 9.2.8 Close or verify closed valve FP-701 _____
- 9.2.9 Open or verify open valve 54-43 _____
- 9.2.10 Close or verify closed valve FP-25 _____
- 9.2.11 Open or verify open valve 54-44 _____
- 9.2.12 Open or verify open valve BV-54-13 _____
- 9.2.13 Close or verify closed valve BV-54-37 _____



| 9.2 | <u>BLOCK 1</u> (Figure 1A) (Cont'd) | INITIALS |
|--------|--|----------|
| 9.2.14 | Close or verify closed valve BV-57-26 | _____ |
| 9.2.15 | Close or verify closed valve BV-54-34 | _____ |
| 9.2.16 | Close or verify closed valve BV-54-39 | _____ |
| 9.2.17 | Open or verify open valve FCV-54-15 | _____ |
| 9.2.18 | Close or verify closed valve FP-303 | _____ |
| 9.2.19 | Close or verify closed valve FP-703 | _____ |
| 9.2.20 | Close or verify closed valve BV-85-160 | _____ |
| 9.2.21 | Close or verify closed valve BV-49-53 | _____ |
| 9.2.22 | Open or verify open valve BV-54-16 | _____ |
| 9.2.23 | Close or verify closed valve 54-75 | _____ |
| 9.2.24 | Close or verify closed valve 54-78 | _____ |
| 9.2.25 | Close or verify closed valve 54-74 | _____ |
| 9.2.26 | Close or verify closed valve 54-77 | _____ |
| 9.2.27 | Open or verify open valve 54-56 | _____ |
| 9.2.28 | Close or verify closed valve FP-302 | _____ |
| 9.2.29 | Close or verify closed valve FP-702 | _____ |
| 9.2.30 | Open or verify open valve 54-42 | _____ |
| 9.2.31 | Close or verify closed valve FP-26 | _____ |
| 9.2.32 | Open or verify open valve BV-54-12 | _____ |
| 9.2.33 | Close or verify closed valve BV-54-38 | _____ |
| 9.2.34 | Close or verify closed valve BV-57-27 | _____ |
| 9.2.35 | Close or verify closed valve BV-54-35 | _____ |
| 9.2.36 | Close or verify closed valve BV-54-40 | _____ |
| 9.2.37 | Open or verify open valve FCV-54-14 | _____ |
| 9.2.38 | Close or verify closed valve FP-304 | _____ |



- | | <u>BLOCK 1</u> (Figure 1A) (Cont'd) | INITIALS |
|---------|--|--------------|
| 9.2.39 | Close or verify closed valve FP-704 | _____ |
| 9.2.40 | Close or verify closed valve at PSL-54-29, PSL-54-30, at pump suction | _____ |
| 9.2.41A | Connect Hydrostatic Test Pump at drain valves before DP Instrumentation. | _____ |
| 9.2.41B | Notify I&C to valve out and equalize all Diff. pressure transmitters and indicators. | _____ |
| 9.2.42 | Connect Hydrostatic Test Pump to Service Air Supply. | _____ |
| 9.2.43 | Connect Hydrostatic Test Pump to Condensate Water Supply. | _____ |
| 9.2.44 | Vent Hydrostatic Test Pump. | _____ |
| 9.2.45 | Open drain valve for DP Instrumentation and Pressurize System to 85 PSIG.** | _____ |
| | <u>NOTE:</u> The test pressure shall be maintained throughout the VT-2 examination. The hydrostatic test pump may be operated as required to maintain pressure. | |
| 9.2.46 | Verify completion of 10 minutes hold time at test pressure prior to commencing the VT-2 examination. | _____ |
| 9.2.47 | Perform the VT-2 Examination. The VT-2 Examination shall be performed by a certified VT-2 Examiner in conjunction with any NMPC-QA approved Nondestructive Examination Procedures. Inspect the entire boundary as shown in Figure 1A, and record all leakage on the Leak Identification Data Sheet (Attachment 1). | _____ |
| 9.2.48 | Stop Hydrostatic Test Pump. | _____ |
| 9.2.49 | Close Hydrostatic Test Pump Service Air Supply. | _____ |
| 9.2.50 | Close Hydrostatic Test Pump Condensate Water Supply. | _____ |
| 9.2.51 | Depressurize System using Hydrostatic Test Pump Vent Valve. | _____ |
| 9.2.52 | Close drain Valve for DP Instrumentation. | _____/_____* |
| 9.2.53 | Disconnect Hydrostatic Test Pump and associated equipment. | _____ |

* Requires Independent Verification

** See notes under Section 10.0 of this procedure.

10.0 GENERAL COMMENTS/RECOMMENDATIONS

- 10.1 The hydrostatic pressure test is performed as per IWC-5222.a and b of ASME code, Section XI, 1980 through 1981 addenda.
- 10.2 • The system is hydro tested at 85 psig (max. operating pressure), to protect over pressurization of the pre-coat filters. Over pressurization of the pre-coat filter gasket may cause leakage and spreading of contamination in the plant. In order to pressurize the system to a higher test pressure (140 psig), a plant mod. is required to bypass the filters and replace the existing isolation valves with gate or globe valves.

NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-15

1. COMPONENT IDENTIFICATION

System: Main Steam, Turbine By-pass Valve
Class: 2
Component: Main Steam Class 2 Piping

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

IWA-5000 and IWC-5222 System Hydrostatic Test.

3. RELIEF REQUESTED

Relief is requested from the requirement to hydrostatically test a Class 2 portion of Main Steam piping at the elevated Class 2 pressure. This piping portion is identified by Appendix A of N1-ISI-HYD-01.

4. BASIS FOR RELIEF

This portion of piping will not be tested at the Class 2 hydrostatic pressure of 1285 psig. It will be tested at the Class 1 hydrostatic pressure of 1145 psig in conjunction with the Reactor Pressure Vessel (RPV) and Class 1 systems. The Main Steam Isolation Valves are unidirectional valves designed to close with the direction of flow from the Reactor Pressure Vessel, and thus are designed to withstand a pressure differential of only approximately 35 psig in the reverse direction. Performance of the test at Class 2 pressure from the outboard side of the valve would exceed this valve seat design for the reverse direction. Non-isolatable Class 1 portions of piping back through the RPV are not designed for the elevated Class 2 hydrostatic test pressure. Leakage past the seat of the turbine stop valve would result in the inability of a high pressure/low volume hydrostatic pressure pump to provide make-up volume so as to maintain the elevated Class 2 pressure.

5. ALTERNATE EXAMINATION

The hydrostatic test will be performed on this portion of piping at the Class 1 hydrostatic test pressure.

Relief Request ISI-15
Page 2

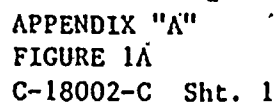
6. PLANT QUALITY AND SAFETY

The examination as proposed provides an acceptable level of assurance of piping system integrity.

7. RADIATION CONSIDERATIONS

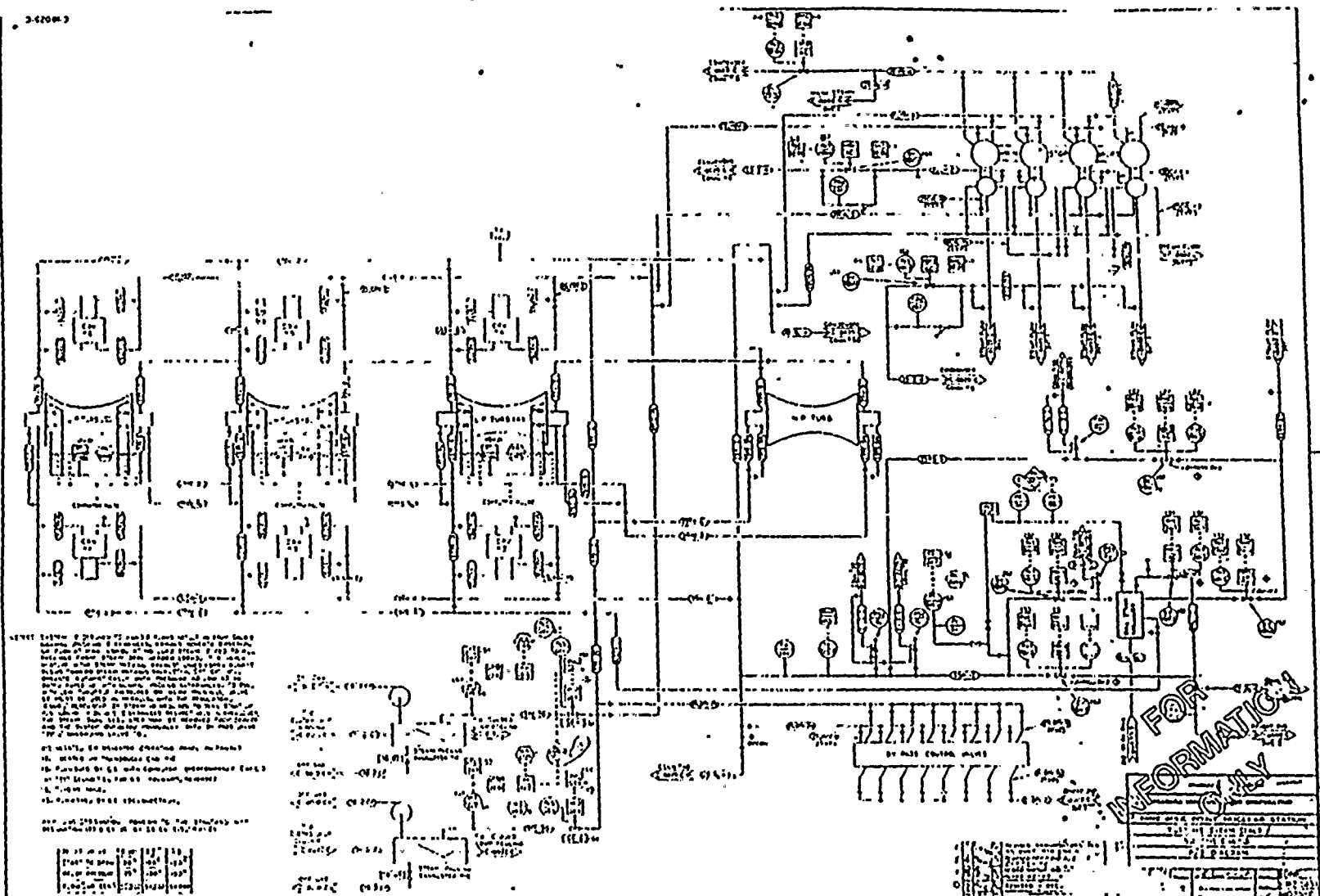
Radiation considerations are not a basis for this request for relief.

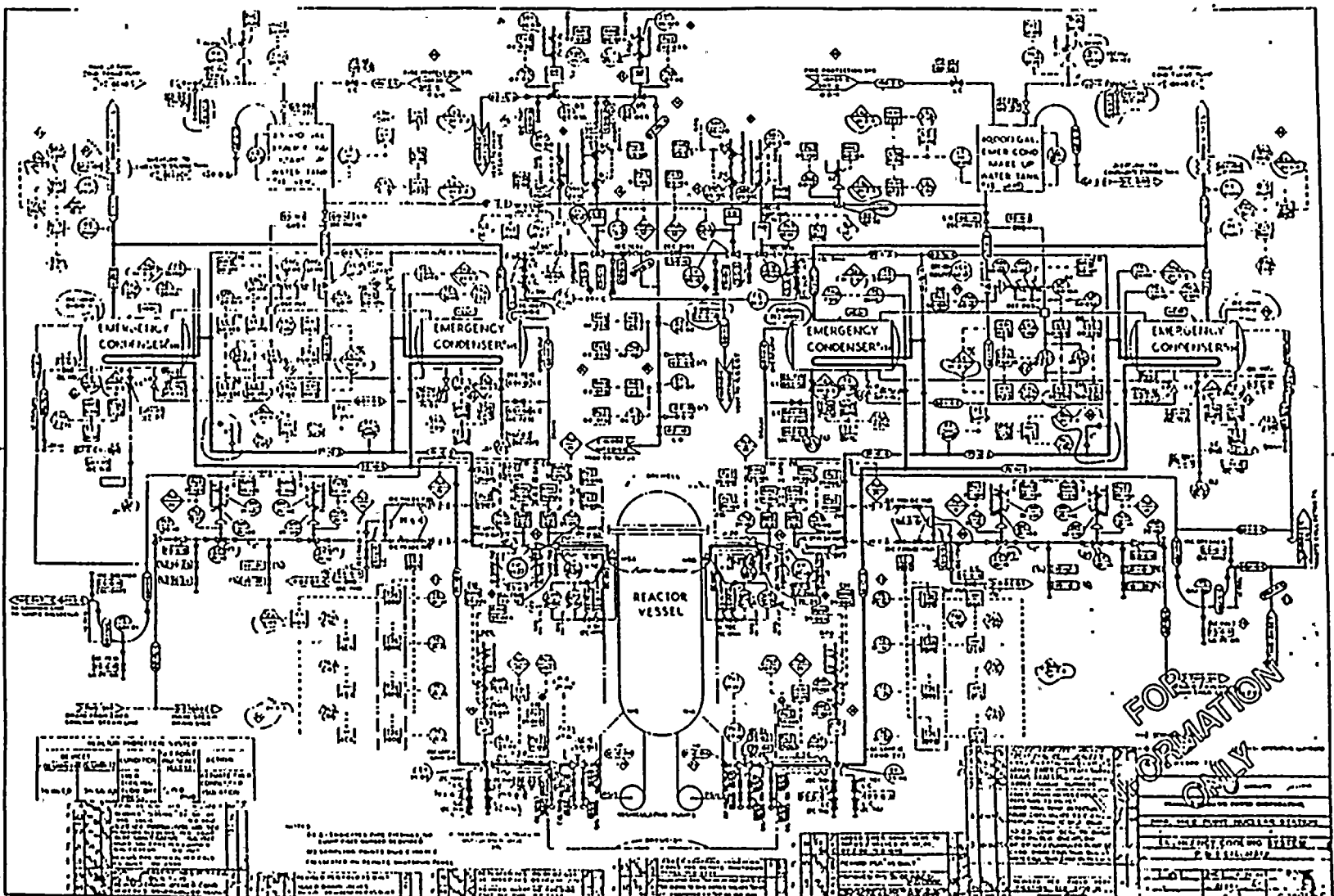




DFN 3411

APPENDIX "A"
FIGURE 1B C-18025-C





NINE MILE POINT UNIT 1

Second Interval Inservice Inspection Relief Request ISI-16

1. COMPONENT IDENTIFICATION

| | |
|------------|--------------------------|
| System: | Control Rod Drive |
| Class: | 2 |
| Component: | Control Rod Drive Piping |

2. ASME SECTION XI INSPECTION REQUIREMENTS

1983 Edition with Addenda through Summer 1983

IWA-5000 and IWC-5222 System Hydrostatic Test.

3. RELIEF REQUESTED

Relief is requested from the requirement to hydrostatically test the portion of the insert and withdraw lines inboard to the Reactor Pressure Vessel (RPV) from valves 101 (CRD-E) and 102 (CRD-F), These are portions of piping for one hundred and twenty-nine (129) drives.

4. BASIS FOR RELIEF

The insert and withdraw lines will be pressurized at the Class 1 hydrostatic pressure in conjunction with the RPV and Class 1 systems. The design of the Control Rod Drive mechanism provides for leakage past the drive piston and collet piston. This leakage would result in the inability to achieve the elevated Class 2 hydrostatic test pressure or would result in subjecting the RPV and class 1 non-isolatable portions to the elevated Class 2 pressure.

5. ALTERNATE EXAMINATION

The hydrostatic test will be performed on this portion of piping at the Class 1 hydrostatic test pressure.

6. PLANT QUALITY AND SAFETY

The tests as proposed provide an acceptable level of assurance of piping system integrity.



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Relief Request ISI-16
Page 2

7. RADIATION CONSIDERATIONS

Radiation considerations are not a basis for this request for relief.

