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Docket 50-293

Response to Request for Additional Information
Second Ten Year Internal Inservice Inspection
Plan and Associated Requests for Relief
(TAC No. M85846)

This responds to your request for additional information (RAI) dated February 7, 1994.

Enclosure (A) provides the requested information for Relief Requests PRR-17, PRR-18, and PRR-19. Enclosure (B) provides a revised Relief Request PRR-17. Enclosure (C) provides informational drawing packages for the revised PRR-17, Rev. 1, PRR-18 and PRR-19 and will only be provided to the Document Control Desk and EG&G.

As requested, a copy of this response with all enclosures is provided to EG&G Idaho Inc.

E. T. Boulette, PhD

ETB/GGW/nas/Rap94/SEC10YR

- Enclosures: (A) Additional Information to NRC for Relief Requests PRR-17, 18 and 19
(B) Revised Relief Request PRR-17, Rev. 1
(C) Informational Drawing Packages for Revised PRR-17, Rev. 1, PRR-18, and PRR-19

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Enclosure (A)

Response to Request for Additional Information
Second 10-year Interval Inservice Inspection Plan
and Associated Request for Relief
(TAC No. M85846)

NRC Request for Additional Information

Based on review of Amendment #92-1 to the Pilgrim Nuclear Power Station Second 10-Year Interval Inservice Inspection Program Plan, the NRC staff has concluded that the following information and/or clarification is required to complete the review of this amendment.

RAI for PRR-17:

- A. Request for Relief PRR-17, Rev. 0, III. Alternate Provisions states: "For examinations scheduled during the second ten year interval, an alternate weld has been scheduled as shown on Table PRR-17.1". It is noted that of the 12 examination areas for which relief is requested, only two welds have been selected as alternative examination areas.

Based on the review of this request for relief, the staff has determined that the licensee has not provided a) sufficient information relating to the limitations associated with the subject examination areas or b) the basis for the selection of two alternate examination areas for 12 areas for which relief is requested. Please provide the following information to support the staff evaluation: (1) an explanation for the selection of only two alternate examination areas; (2) clarification of the limiting factors contributing to the inaccessibility of the subject examination areas and the percentage of the Code-required examination area that can and will be examined (include drawings, sketches, and examination records as applicable to support the inaccessibility/limitations); (3) the Code classes and item numbers for the welds for which relief is requested, and (4) the basis for concluding that the alternative examinations provide continued reasonable assurance of component and system integrity.

BECO Response for PRR-17:

A review of background information for PRR-17 indicates that a response to the NRC RFI should include the submittal of a revised relief request along with the following clarifying information:

- Welds HB-10-F65 and GB-10-F244 were the only welds for which alternate welds were specified because they are both terminal end welds. Inspection of all terminal ends during each interval is required by code. Therefore, selection of alternate welds to be examined is appropriate.
- The remaining welds originally listed on PRR-17, Rev. 0, are also inaccessible Category B-J and C-F welds. Code relief is not required, however, as these welds are within the ISI boundaries, but are not

terminal end, dissimilar metal or high stress welds and are not required to be selected as part of the ASME X inspection sample. The Category B-J and C-F weld inspection samples at PNPS already satisfy the code which requires inspection samples that consist of 25% of the respective category total weld population, including all terminal end, dissimilar metal and high stress welds. Therefore, neither code relief nor the addition of alternate welds of these inaccessible welds is required as they are not part of the program. These welds have been deleted from PRR-17, Rev. 1.

Informational Drawing List for PRR-17

Weld No.	HB-10-F65	GB-10-F244
Dwg. Ref.	M33 M50 ISI-I-10-1C 6498-673 HB10-3002 C941	M31 M54 M56 Section G2 M100-682-2 ISI-I-10-4B

B. NRC RAI for PRR-18:

Request for Relief PRR-18, Rev. 0, addresses relief from visual examination of component supports H-4-1-6 and H-10-1-13SA due to inaccessibility. Based on the review of this request for relief, the staff has determined that the licensee has not provided sufficient information on the accessibility of the subject examination areas. Please provide the following information to support the staff evaluation: (1) clarification of the factors contributing to the inaccessibility of the subject examination areas and the percentage of the Code-required examination areas that can actually be examined (include drawings, sketches, and examination records as applicable to support the inaccessibility/limitations); (2) the Code classes and item numbers for the component supports for which relief is requested; and (3) the basis for concluding that continued reasonable assurance of component and system integrity is provided when no alternative examination is provided.

BECO Response to PRR-18:

Support H-4-1-6 is shown on isometric drawings ISI-I-12-1 and M1003, Sheet 1. The location is 7'-1" from the Reactor Vessel center line and 2'-5" below the Reactor Vessel. This is shown partially by drawings M-1043, M-42, 232-335 and 232-341.

Based on the drawings, the support is outboard of control rod drives by 1'-1" and located in a zone which has 20" of clearance between the control rod drives and the wall. The nearest floor is approximately 17 feet below the support.

Because the support is on a 2" line, code paragraph IWB-1220(c) applies. Relief was requested to confirm this. Reasonable assurance of component and system integrity is provided due to the nondestructive examinations of piping welds on the same line just downstream of the inaccessible area.

The support is on a Class 1 line and is classified as Category F-B, Item F(1-3).

Support H-10-1-13SA is located in a pipe chase enclosed by blockwalls 63.10, 63.11 and 63.12 as shown on drawings ISI-I-10-1C, 6498-673 and C-941. The location can be seen spatially on drawing M-50, Section M3-M3. The support is on a Class 2 line, Category F-B, Item F(1-3).

The safety-related blockwalls directly adjacent to the support are 30 inches thick. Disassembly would require a substantial expenditure of labor, cost and exposure. Access from below is not possible due to a doghouse-type blockout with no access in the Torus Room ceiling (elev. 17'). Remote access from above would require manipulating a camera vertically 30 feet down a crowded pipechase from a high radiation area (Clean-up Backwash Receiver Tank Room) on the 51' elevation. This approach would have a poor chance of success and is unlikely to result in a quality visual examination.

Continued reasonable assurance of component and system integrity is provided by the periodic inspection of the two upstream spring hanger supports. Spring can load settings would fail the inspection acceptance criteria should a failure of H-10-1-13SA occur. Additionally, should a pressure boundary failure occur in the 6 inch line, leakage would be detected by daily plant operator tours of the Torus Room.

C. NRC RAI for PRR-19:

Request for Relief PRR-19, Rev. 0, addresses limitations associated with the examination of longitudinal weld 10R-0-9LD. Please provide the following information to support the staff evaluation: (1) the length of the longitudinal seam that is accessible for examination in conjunction with the circumferential weld (include drawings, sketches, and examination records as applicable to support the inaccessibility /limitations); and (2) the basis for concluding that continued reasonable assurance of component and system integrity is provided by the alternative examination proposed. The schedule for timely completion of this review requires that the Licensee provide, by the requested date, the above requested information and/or clarification with regard to Pilgrim Nuclear Power Station Second 10-Year Interval Inservice Inspection Program Plan, Amendment 92-1.

BECo Response to PRR-19:

The longitudinal seam 10R-0-9LD is covered by the pipe clamp for Support H-10-1-177. Refer to drawing H10-I-177 for the support details, to BECo drawings M1HA9 (GE Dwg. #12D3432) for the support location, and to drawing M1HA7 (GE Dwg. 112D3429) for the weld location.

The center of the pipe clamp is 9.38 inches from the center of the circumferential weld which is the termination of 10R-0-9LD. The pipe clamp is 5 inches wide and weld crowns of twenty inch pipe are typically 3" wide. Considering the transducer width and the constraints caused by the support clamps, approximately 1/3" of the required 12" of weld could be examined.

Our request is to allow the first 12" of weld on the opposite side of the clamp be examined. This is considered equivalent because Pilgrim has not had indications in any longitudinal seams and because longitudinal seams are not known to be a critical examination area in the industry.

Enclosure (B)

REVISED RELIEF REQUEST PRR-17, REV. 1

I. IDENTIFICATION OF COMPONENTS AND IMPRACTICAL CODE REQUIREMENT

The ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition, through and including the Winter 1980 Addenda, requires all Class 2 welds be inspected in accordance with Table IWC-2500-1, Category C-F.

Relief is requested from performing the Class 2, Category C-F, Item C5.11 examinations for components listed on Table PRR-17.1 based on inaccessibility.

II. BASIS FOR RELIEF

For plants whose construction permits were issued prior to January 1, 1971, components shall meet Section XI requirements to the extent practical, see 10CFR50.55a(g)(1).

Accessibility for the examination of the welds listed on Table PRR-17.1 was not provided for in the original plant design which occurred prior to the issuance of Section XI Inservice Inspection requirements. The limiting factors creating the inaccessibility of the two welds listed in Table PRR-17.1, Rev. 1, are as follows:

- Weld HB-10-F65 is located in a pipe chase enclosed by safety-related 30 inch thick blockwalls 63.10, 63.11 and 63.12. Boston Edison believes that no appreciable assurance of component or system integrity is gained by disassembling the blockwalls for inspection access every ten years compared to the inspection of a similar accessible weld on the same line (HB-10-F63).
- Weld GB-10-F244 is inaccessible to surface examination due to the close proximity of adjacent pipes in the ceiling of the "A" Auxiliary Bay. The selection of one of the nearest accessible welds on the same line (HB-10-F239) as an alternate, will provide an equivalent assurance of component and system integrity.

This constitutes a basis for relief from the examination requirements of Section XI.

III. ALTERNATE PROVISIONS

Alternate welds have been scheduled for examination during the second ten year interval as shown on Table PRR-17.1. Continued reasonable assurance of component and system integrity is provided because the selected alternate welds are of the same system, pipe run, size, type and material as the inaccessible welds.

Enclosure (B) (continued)

TABLE PRR-17.1

<u>Weld ID NO.</u>	<u>Class</u>	<u>Category</u>	<u>Item</u>	<u>Interference</u>	<u>Alternate Exam</u>
HB-10-F65	2	C-F	C5.11	Blockwalls 63.10, 63.11 & 63.12	HB-10-F63
GB-10-F244	2	C-F	C5.11	Inadequate clearance from piping	GB-10-F239