



Northern States Power Company

Monticello Nuclear Generating Plant
2807 West Hwy 75
Monticello, Minnesota 55362-9637

March 14, 1996

10 CFR Part 50
Section 50.55a

US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
Docket No. 50-263 License No. DPR-22

Request for Relief for the 3rd 10-Year Interval Inservice Inspection Program

On August 5, 1994 we submitted for review our latest revision of our third 10-year Inservice Inspection Examination Plan for Monticello. The purpose of this letter is to request review and approval of ISI Relief Request No. 8 to the third 10-year plan.

Attached is Monticello's Relief Request No. 8 which addresses documentation requirements for calibration blocks. The new code requirements for calibration block material documentation were discovered when we were preparing to purchase material for some new calibration blocks. The documentation that we have for our existing calibration blocks does not meet all of the revised requirements. We thus are requesting relief for documentation of our existing calibration blocks.

A similar Relief Request was granted for the Prairie Island plant on February 22, 1996.

This letter contains no new Nuclear Regulatory Commission commitments.

Please contact Sam Shirey, Sr. Licensing Engineer, at (612) 295-1449 if you require further information.

William J Hill
Plant Manager
Monticello Nuclear Generating Plant

c: Regional Administrator - III, NRC
NRR Project Manager, NRC
Sr Resident Inspector, NRC
State of Minnesota
Attn: Kris Sanda
J Silberg

Attachment: ISI Relief Request No. 8

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**Monticello ISI Relief Request No. 8 (Rev. 0)
Use of Existing Calibration Blocks**

SYSTEM: Various

Class: 1 and 2

Category: B-A
B-D
B-F
B-J
C-A
C-F-1
C-F-2

Item: B 1.21, B 1.22, B 1.30, B 1.40
B 3.90, B 3.100
B 5.10, B 5.130
B 9.11, B 9.12, B 9.31
C 1.10, C 1.20
C 5.11, C 5.12
C 5.51, C 5.52

Examination Requirements:

IWA-2232(a) of ASME Section XI states that:

"Ultrasonic examination of vessel welds greater than 2 inches thick shall be conducted in accordance with Article 4 of Section V, amended as follows."

Section V, Article 4, T-441.1.2 outlines the material specification requirements for calibration blocks. T-441.1.2.1 requires calibration blocks to be fabricated from one of the following: (a) nozzle drop out from the component; (b) a component prolongation, or; (c) material from the same material specification, product form, and heat treatment as one of the materials being joined.

IWA-2232(b) states that:

"Ultrasonic examination of piping systems shall be conducted in accordance with ASME Section XI, Appendix III."

Appendix III, III-3411 which outlines the material specification requirements for calibration blocks requires that:

"(a) The calibration blocks for similar metal welds shall be fabricated from one of the same materials specified for the piping being joined by the weld. (b) Calibration blocks for dissimilar metal welds to be fabricated from the material specified for the side of the weld from which the examination will be conducted. If the examination will be conducted from both sides, calibration reflectors shall be provided in both materials. (c) Where the examination is to be performed from only one side of the joint, the calibration block material shall be of the same specification as the material on that side of the joint. (d) If material of the same specification is not available, material of similar chemical analysis, tensile properties, and metallurgical structure may be used."

IWA-2232(d) states that:

"If the requirements of (a), (b), or (c) above are not applicable, the ultrasonic examination shall be conducted in accordance with the applicable requirements of Article 5 of Section V, amended as follows."

**Monticello ISI Relief Request No. 8 (Rev. 0)
Use of Existing Calibration Blocks**

IWA-2232(d)(4)(a) states that:

"The material from which the blocks are fabricated shall be: (1) a nozzle dropout from the component; (2) a component prolongation; or (3) material of the same material specification, product form, and heat treatment as one of the materials being joined. (b) For calibration blocks for dissimilar metal welds, the material selection shall be based on the material on the side of the weld from which the examination will be conducted. If the examination will be conducted from both sides, calibration reflectors shall be provided in both materials."

Examination Requirement Not Met

Several of the calibration blocks currently being used lack the documentation necessary to demonstrate compliance with the material specification requirements of Article 4 of Section V and Appendix III.

Several of the calibration blocks currently being used on pipe to fitting, or fitting to fitting joints where examination is performed from both sides of the joint, are fabricated to pipe material specifications.

Basis for Relief:

Documentation requirements existing at the time of fabrication did not require traceability to the material's chemical or physical certifications. Existing calibration blocks certification is verified through appropriate P-number grouping. The P-number grouping provides adequate assurance that the blocks will establish the proper ultrasonic calibration and sensitivity.

Proposed Alternative

Existing calibration blocks will be used as is. Any calibration blocks obtained in the future will be obtained with documentation to demonstrate compliance with the material specification requirements of ASME Code Section V Article 4 or Section XI, Appendix III, as applicable.

Justification for Granting Relief

It would be impractical to fabricate a new set of calibration blocks in order to satisfy the documentation requirements of the current Code. Existing records, indicate the appropriate P-number grouping, thereby providing adequate assurance that the blocks will establish the proper ultrasonic calibration and sensitivity.

Any new calibration block will be obtained with the documentation necessary to demonstrate compliance with the material specification requirements.

Time Period Relief is Requested For

Relief is requested for the Third Ten Year Interval.

Approval Status:

Not yet approved. Submitted Rev 0 March 14, 1996.