

**LOUISIANA  
POWER & LIGHT**

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May 28, 1985

W3P85-1298  
A4.05

Mr. G. W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Knighton:

Subject: Waterford 3 SES  
Docket No. 50-382  
License No. NPF-38  
TEN YEAR INSERVICE INSPECTION PROGRAM, REVISION 0

Reference: License Condition 2.C.5

In accordance with 10CFR50.55a(g), "Inservice Inspection Requirements" and License Condition 2.C.5, Louisiana Power & Light Company hereby submits seven (7) copies of the Ten Year Inservice Inspection Program which is prepared in accordance with the ASME Code Section XI, 1980 Edition with Addenda through Winter 1981. Relief from the testing requirements of Section XI is requested when full compliance with the requirements of the code is not practical. In such cases, specific information is provided which identifies the applicable code requirements, justification for the relief request, and the testing method to be used as an alternative.

It is hereby requested that the subject Program be approved and the ASME Section XI code relief requested be granted pursuant to Section 50.55a(g)(6)(i) of 10CFR50.

Very truly yours,

K.W. Cook  
Nuclear Support & Licensing Manager

KWC:BGM:sms

Enclosure

Attachment

8506030385 850528  
PDR ADOCK 05000382  
G PDR

cc (w/o enclosure): E.L. Blake, W.M. Stevenson, R.D. Martin, D.M. Crutchfield,  
J.H. Wilson, NRC Resident Inspectors Office

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## 1.0 GENERAL

### 1.1 Introduction

In accordance with 10CFR50.55a(g) "Inservice Inspection Requirements", the following is the Inservice Inspection Program for the first 10 Year Interval of commercial operation at the Waterford Nuclear Plant, Unit No. 3. This program meets, as much as practical, the requirements of the 1980 Edition through Winter 81 addenda of the ASME Boiler and Pressure Vessel Code. This program documents all examination requirements, relief from required examinations and any supplemental examinations applied to plant systems. The examinations are scheduled in accordance with Inspection Program B and implemented by Outage Plans which contain specific drawings, NDE procedures, calibration standard information, and the minimum/maximum number of items to be examined per period.

### 1.2 Effective Date

The start of the first 10 Year Interval commences at placement of Waterford 3 into commercial operation as specified in IWA-2400. If the unit is out of service continuously for 6 months or more during the Interval, the Inspection Interval may be extended at LP&L's option for a period equivalent to the outage.

### 1.3 Records

Records and documentation of all information and examination results which provide the basis for evaluation and facilitate comparison with results from previous and subsequent inspections are maintained in accordance with IWA-6000 and are available for review for the active life of the plant.



#### 1.4 Personnel Qualification

Personnel performing non-destructive examinations are qualified with a written procedure prepared in accordance with SNT-TC-1A 1980. The certification of personnel currently qualified with a procedure prepared in accordance with 1975 edition of SNT-TC-1A is valid until recertification is required. At that time, re-certification is in accordance with the 1980 edition of SNT-TC-1A. In addition, the requirements of IWA-2300 apply when certifying NDE personnel.

#### 1.5 Method of Examination

The method of examination is delineated in examination tables in subsequent sections. Specific techniques for performing examinations are as noted below:

##### 1.5.1. Ultrasonic Examination

Ultrasonic (UT) examination is performed when a volumetric examination is required. The examinations are performed in accordance with Appendix III of Section XI and Articles IV and V of Section V, as applicable. A documented evaluation of any indications that are 50% of the Distance Amplitude Correction (DAC) Curve or greater is recorded. Any geometric indication 100% of DAC or greater is evaluated by a Level II or III examiner to the extent necessary to determine the size, shape, identity and the location of the reflector. Any non-geometric indication 20% of DAC or greater is recorded and investigated by a Level II or Level III examiner to the extent necessary to determine the shape, identity and location of the reflector.

1.5.1 Cont'd

Where acceptance standards for a particular component or examination category are in the course of preparation, the evaluation is based on acceptance standards in later editions of Section XI accepted by the Regulatory Authorities or acceptance standards for materials and welds specified in the Section III edition applicable to the construction of the component. All results of evaluations and examinations are documented in accordance with Article IWA-6000.

1.5.2 Radiographic Examination

Radiographic (RT) examination is used to supplement ultrasonic examination as required. Procedures used will be as specified in Article 2 of Section V.

1.5.3 Magnetic Particle Examinations

Magnetic particle (MT) examination is used when surface examination of carbon steel items is required. Procedures used will be as specified in Article 7 of Section V. Where conditions exist which render MT impossible or impractical, PT is utilized as an alternate surface exam if possible.

1.5.4 Liquid Penetrant Examinations

Liquid penetrant (PT) examination is used when a surface examination is required on non-magnetic items. Procedures used will be as specified in Article 6 of Section V. As noted above, PT is also an acceptable alternative for carbon steel items.

#### 1.5.5 Visual Examinations

Visual Examination is employed whenever a VT-1, VT-2, VT-3, or VT-4 is required by the examination tables in subsequent sections.

#### 1.6 Supplemental Program for Intergranular Stress Corrosion Cracking (IGSCC)

This supplemental program was established by Louisiana Power and Light in order to address concerns relative to IGSCC in stainless steel piping containing stagnant borated water. LP&L selected approximately 10% of the total number of welds in certain designated lines of Safety Injection and Containment Spray systems for volumetric examination in lieu of the required surface examinations. Every effort has been made to select a representative sample of weld types with particular emphasis placed on areas where structural discontinuities are present. See Relief Request ISI-002 for specific lines that were selected for this program.

#### 1.7 Augmented Inservice Inspection Program for High Energy Piping

Based on a review of NUREG 0800 (formerly NUREG-75/087), Sections 6.6 and 3.6.1, including Branch Technical Position ASB 3-1 and Appendices A through C, and the Waterford 3 FSAR Sections 6.6 and 3.6.2.1.4, LP&L has developed an augmented program for implementation at the Waterford 3 Steam Electric Station. The augmented ISI program is based upon the requirements of paragraph 11.7 of SRP Section 6.6. These requirements are applied by LP&L as follows:

##### 1.7.1 Main Steam and Feedwater Piping

1.7.1.1 All circumferential and longitudinal welds from both Steam Generators to the first rigid restraint past the outer containment isolation valve are 100 percent volumetrically examined except as restricted by part geometry or access.

1.7.1.2 All welds within the Class 2 boundaries of the Main Steam and Feedwater systems not addressed in 1.7.1.1 above are examined in accordance with the methods specified in Table IWC-2500-1, Category C-F.

1.7.2 Safety Injection Piping

1.7.2.1 The augmented ISI requirements of SRP 6.6 and BTF 3-1 are imposed on the two 14-inch shutdown cooling lines and the four 8-inch LPSI lines penetrating containment.

1.7.2.2 All circumferential welds on the two 14-inch shutdown cooling lines between the containment inboard and outboard isolation valves are 100 percent volumetrically examined except as restricted by part geometry or access.

1.7.2.3 All circumferential welds on the four 8-inch LPSI lines between the containment inboard and outboard isolation valves are 100 percent volumetrically examined except as restricted by part geometry or access.

1.7.2.4 All remaining welds within the Class 2 examination boundaries of the Safety Injection system are examined by the method specified in Table IWC-2500-1, Category C-F.

1.7.3 The following line numbers are included in the Augmented Program:

LINES IN  
AUGMENTED PROGRAM

2MS34-1A  
2MS40-163A  
2MS40-5A  
2MS40-164A  
P 5MS40-6A  
2MS34-10B  
2MS40-165B  
2MS40-39B  
2MS40-166B  
P 5MS40-15  
2FW18-40A  
2FW20-12A  
P 5FW20-11  
2FW18-41B  
2FW20-14B  
P 5FW20-13  
P 2SI14-18A  
P 2SI14-18B  
2SI8-138RL2B  
2SI8-130RL2A  
2SI8-113RL1A  
2SI8-122RL1B

NOTE - The entire line is included in the augmented program unless noted by a "P" which denotes partial.



1.8 Eddy Current Examination of Steam Generator Tubing

The Steam Generator tubing is examined in accordance with paragraphs 4.4.4.0 through 4.4.4.5 of the Waterford 3 Plant Technical Specifications and USNRC Regulatory Guide 1.83.

1.9 Reactor Coolant Pump Flywheel Examination

The Reactor Coolant Pump Flywheel examination will be performed in accordance with paragraph 4.4.9 of the Waterford 3 Plant Technical Specifications and USNRC Regulatory Guide 1.14.

1.10 Mechanical and Hydraulic Snubber Examination

All mechanical and hydraulic snubbers are visually examined and functionally tested in accordance with paragraph 4.7.8 of the Waterford 3 Technical Specifications. Therefore, snubbers are not included in the scope of the Inservice Inspection Program.

1.11 Ultrasonic Calibration Standards

Existing PSI calibration standards are used for the first 10 Year Interval at Waterford 3. These standards were utilized during pre-service and were designed and manufactured to satisfy the intent of Article 5 and Appendices I and III of Section XI, 1974. Modification to or replacement of existing calibration standards would not significantly increase meaningful data and could reduce baseline comparison capability. Any new blocks that are purchased will satisfy the requirements in effect at the time of purchase.

1.12 Subsequent Inservice Inspection Plan Revisions

Subsequent 120 month inspection intervals throughout the service life of the facility will comply, where practical, with those requirements in editions of the code and addenda in effect 12 months prior to the start of each inspection interval.

1.13 Repairs and Replacements

Repairs and replacements at Waterford 3 are performed in accordance with the LP&L Section XI Repair and Replacement Program. As required by Articles IWA-4000 and IWA-7000, this program delineates the essential requirements of the complete repair cycle including weld repairs and procurement and installation of replacements.

The program consists of administrative procedures which describe overall departmental responsibilities and interfaces, the Authorized Nuclear Inspector's involvement and documentation requirements. Also, Maintenance and Plant Quality departmental procedures implement controls for special processes essential to the repair program such as flaw removal, weld repair, post weld heat treatment and non-destructive examination.

The repair program complies with the requirements of Articles IWB, IWC, IWD and IWF-4000.

1.14 Additional Examinations

If examinations conducted during Inservice Inspection reveal indications exceeding allowable standards, additional examinations are performed as specified in IWB, IWC and IWF-2430.

## 2.0 INSERVICE INSPECTION CLASS 1 COMPONENTS

Based on Table IWB-2500-1, the examination categories and items identified in the Examination Table are subject to examination under LP&L's Inservice Inspection Program. The Examination Table identifies the non-exempt components subject to examination, the total number of items under each category, and any Relief Requests associated with each item. All welds whose stress levels exceed that shown in IWB-2500-1 (Cat B-J) are examined. Additional details regarding exemptions and hydrostatic testing are addressed below.

### 2.1 Exemptions (IWB)

The following IWB-1220(B) exemptions apply to all applicable categories of IWB-2500-1. Also, the selection of supports under Article IWF is affected by these exemptions.

2.1.1 Piping of 1 inch nominal pipe size and smaller, except for Steam Generator tubing.

2.1.2 Components and their connections in piping of 1 inch nominal pipe size and smaller.

### 2.2 System Pressure Tests (IWB)

As required by Tables IWA-5210-1 and IWB-2500-1, the system pressure tests described in IWA-5211 are conducted as follows:

2.2.1 Hydrostatic Test (IWA-5211d)

The hydrostatic testing requirements of IWB-2500 are required to be performed at or near the end of each inspection interval. The procedures detailing the hydrostatic testing and any Relief Requests associated with these tests will be developed during the second period of the first Interval. All hydrostatic testing required due to repair or replacement activity is handled on a case by case basis. The hydrostatic tests and associated repair/replacement activities are documented on NIS-II forms which are submitted with an Outage Summary Report after refueling outages.

2.2.2 System Leakage Test (IWA-5211a)

After each refueling outage, the Class 1 pressure boundary is subjected to a visual exam (VT-2) with the system(s) at nominal operating pressure. The pressure retaining boundary corresponds to the reactor coolant system boundary with all Class 1 valves in the normal position required for normal reactor startup. Also, the visual exam (VT-2) extends to and includes the second closed valve at the Class 1 pressure boundary extremity.

LOUISIANA POWER AND LIGHT  
WATERFORD STEAM ELECTRIC STATION UNIT NO. 3  
INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS

EXAMINATION CATEGORY B-A

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
B1.10	Shell Welds			
B1.11	Circumferential	3	Volumetric	
B1.12	Longitudinal	9	Volumetric	
B1.20	Head Welds			
B1.21	Circumferential	2	Volumetric	
B1.22	Meridional	10	Volumetric	
B1.30	Shell-to-Flange Weld	1	Volumetric	
B1.40	Head-to-Flange Weld	1	Volumetric & Surface	
B1.50	Repair Welds			
B1.51	Beltline Region	-	-	

TOTAL OF 26 ITEMS



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EXAMINATION CATEGORY B-B

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Pressurizer			
B2.10	Shell-to-Head Welds			
B2.11	Circumferential	2	Volumetric	
B2.12	Longitudinal	4	Volumetric	
B2.20	Head Welds			
B2.21	Circumferential	-	-	
B2.22	Meridional	-	-	
	Steam Generators (Primary Side)			
B2.30	Head Welds			
B2.31	Circumferential	10	Volumetric	
B2.32	Meridional	18	Volumetric	
B2.40	Tubesheet-to-Head Weld	2	Volumetric	
	Heat Exchangers (Primary Side) - Head			
B2.50	Head Welds			
B2.51	Circumferential	-	-	
B2.52	Meridional	-	-	
B2.53	Longitudinal	-	-	
	Shell (Primary Side)			
B2.60	Tubesheet-to-Shell (or Head) Welds	-	-	
B2.61,	Tubesheet-to-Shell Welds	-	-	
TOTAL OF 36 ITEMS				

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EXAMINATION CATEGORY B-D

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B3.90	Nozzle-to-Vessel Welds	6	Volumetric	
B3.100	Nozzle Inside Radius Section	6	Volumetric	
	Pressurizer			
B3.110	Nozzle-to-Vessel Welds	5	Volumetric	
B3.120	Nozzle Inside Radius Section	5	Volumetric	
	Steam Generators (Primary Side)			
B3.130	Nozzle-to-Vessel Welds	6	Volumetric	
B3.140	Nozzle Inside Radius Section	6	Volumetric	
	Heat Exchangers (Primary Side)			
B3.150	Nozzle-to-Vessel Welds	-	-	
B3.160	Nozzle Inside Radius Section	-	-	

TOTAL OF 34 ITEMS

LOUISIANA POWER AND LIGHT  
WATERFORD STEAM ELECTRIC STATION UNIT NO. 3  
INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS

EXAMINATION CATEGORY B-E

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
B4.10	Partial Penetration Welds			
B4.11	Vessel Nozzles	-	-	
B4.12	Control Rod Drive Nozzles	91	Visual, VT-2	
B4.13	Instrumentation Nozzles	10	Visual, VT-2	
	Pressurizer			
B4.20	Heater Penetration Welds	30	Visual, VT-2	

TOTAL OF 131 ITEMS

LOUISIANA POWER AND LIGHT  
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INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS

EXAMINATION CATEGORY B-F

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B5.10	Nominal Pipe Size > 4 in. Nozzle-to-Safe End Butt Welds	-	-	
B5.20	Nominal Pipe Size < 4 in. Nozzle-to-Safe End Butt Welds	-	-	
B5.30	Nozzle-to-Safe End Socket Welds	-	-	
	Pressurizer			
B5.40	Nominal Pipe Size > 4 in. Nozzle-to-Safe End Butt Welds	5	Volumetric & Surface	
B5.50	Nominal Pipe Size < 4 in. Nozzle-to-Safe End Butt Welds	-	-	
B5.60	Nozzle-to-Safe End Socket Welds	-	-	
	Steam Generator			
B5.70	Nominal Pipe Size > 4 in. Nozzle-to-Safe End Butt Welds	-	-	
B5.80	Nominal Pipe Size < 4 in. Nozzle-to-Safe End Butt Welds	-	-	
B5.90	Nozzle-to-Safe End Socket Welds	-	-	
	Heat Exchangers			
B5.100	Nominal Pipe Size > 4 in. Nozzle-to-Safe End Butt Welds	-	-	
B5.110	Nominal Pipe Size < 4 in. Nozzle-to-Safe End Butt Welds	-	-	
B5.120	Nozzle-to-Safe End Socket Welds	-	-	

CONTINUED

LOUISIANA POWER AND LIGHT  
WATERFORD STEAM ELECTRIC STATION UNIT NO. 3  
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EXAMINATION CATEGORY B-F (continued)

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Piping			
B5.130	Nominal Pipe Size > 4 in. Dissimilar Metal Butt Welds	15	Volumetric & Surface	
B5.140	Nominal Pipe Size < 4 in. Dissimilar Metal Butt Welds	9	Surface	
B5.150	Dissimilar Metal Socket Welds	-	-	

TOTAL OF 29 ITEMS



LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY B-G-1

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B6.10	Closure Head Nuts	54	Surface	
B6.20	Closure Studs, in place	-	-	
B6.30	Closure Studs, when removed	54	Volumetric & Surface	
B6.40	Threads in Flange	54	Volumetric	
B6.50	Closure Washers, Bushings	54	Visual, VT-1	
	Pressurizer			
B6.60	Bolts & Studs	-	-	
B6.70	Flange Surface, when connection disassembled	-	-	
B6.80	Nuts, Bushings, and Washers	-	-	
	Steam Generators			
B6.90	Bolts and Studs	-	-	
B6.100	Flange Surface, when connection disassembled	-	-	
B6.110	Nuts, Bushings, and Washers	-	-	
	Heat Exchangers			
B6.120	Bolts and Studs	-	-	
B6.130	Flange Surface, when connection disassembled	-	-	
B6.140	Nuts, Bushings, and Washers	-	-	

CONTINUED

LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY. B-G-1 (continued)

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Piping			
B6.150	Bolts and Studs	-	-	
B6.160	Flange Surface, when connection disassembled	-	-	
B6.170	Nuts, Bushings, and Washers	-	-	
	Pumps			
B6.180	Bolts and Studs	4 Pumps (64)	Volumetric	
B6.190	Flange Surface, when connection disassembled	4 Flanges (64)	Visual, VT-1	
B6.200	Nuts, Bushings, and Washers	4 Pumps (64)	Visual, VT-1	
	Valves			
B6.210	Bolts and Studs	-	-	
B6.220	Flange Surface, when connection disassembled	-	-	
B6.230	Nuts, Bushings, and Washers	-	-	

TOTAL OF 408 ITEMS

LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY B-G-2

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B7.10	Bolts, Studs, and Nuts	-	-	
	Pressurizer			
B7.20	Bolts, Studs, and Nuts	1 Manway	Visual, VT-1	
	Steam Generators			
B7.30	Bolts, Studs, and Nuts	4 Manways	Visual, VT-1	
	Heat Exchangers			
B7.40	Bolts, Studs, and Nuts	-	-	
	Piping			
B7.50	Bolts, Studs, and Nuts	2 Flanges	Visual, VT-1	
	Pumps			
B7.60	Bolts, Studs, and Nuts	4 Sets of Seal Bolting	Visual, VT-1	
	Valves			
B7.70	Bolts, Studs, and Nuts	40 Valves	Visual, VT-1	
	CRD Housings			
B7.80	Bolts, Studs, and Nuts	-	-	
TOTAL OF 51 ITEMS				

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EXAMINATION CATEGORY B-H

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B8.10	Integrally Welded Attachments	-	-	
	Pressurizer			
B8.20	Integrally Welded Attachments	1	Volumetric or Surface	
	Steam Generator			
B8.30	Integrally Welded Attachments	2	Volumetric or Surface	
	Heat Exchangers			
B8.40	Integrally Welded Attachments	-	-	

TOTAL OF 3 ITEMS

LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY B-J

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
B9.10	Nominal Pipe Size $\geq$ 4 in.			
B9.11	Circumferential Welds	318	Volumetric & Surface	Relief Request ISI-001
B9.12	Longitudinal Welds	64	Volumetric & Surface	Relief Request ISI-001
B9.20	Nominal Pipe Size < 4 in.			
B9.21	Circumferential Welds	361	Surface	
B9.22	Longitudinal Welds	-	-	
B9.30	Branch Pipe Connection Welds			
B9.31	Nominal Pipe Size $\geq$ 4 in.	7	Volumetric & Surface	Relief Request ISI-001
B9.32	Nominal Pipe Size < 4 in.	13	Surface	
B9.40	Socket Welds	-	-	

TOTAL OF 763 ITEMS



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EXAMINATION CATEGORY B-K-1

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Piping			
B10.10	Integrally Welded Attachments	-	-	
	Pumps			
B10.20	Integrally Welded Attachments	4	Volumetric or Surface	
	Valves			
B10.30	Integrally Welded Attachments	-	-	

TOTAL OF 4 ITEMS

LOUISIANA POWER AND LIGHT  
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INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS

EXAMINATION CATEGORY B-L-1, B-L-2, AND B-M-2

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Pumps			
B12.10	Pump Casing Welds (B-L-1)	8	Volumetric	Relief Request ISI-004
B12.20	Pump Casing (B-L-2)	4	Visual, VT-3	Relief Request ISI-004
	Valves			
B12.30	Valves, Nominal Pipe Size < 4 in. Valve Body Welds	-	-	
B12.40	Valves, Nominal Pipe Size $\geq$ 4 in. Valve Body Welds	-	-	
B12.50	Valve Body, Exceeding 4 in. Nominal Pipe Size (B-M-2)	22	Visual, VT-3	Relief Request ISI-003

TOTAL OF 34 ITEMS

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INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS

EXAMINATION CATEGORY B-N-1, B-N-2, AND B-N-3

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B13.10	Vessel Interior (B-N-1)	1 Vessel	Visual, VT-3	
	Reactor Vessel (PWR)			
B13.30	Interior Attachments Within Beltline Region (B-N-2)	6	Visual, VT-1	
B13.31	Interior Attachments Beyond Beltline Region (B-N-2)	9	Visual, VT-3	
B13.32	Core Support Structure (B-N-3)	1 Vessel	Visual, VT-3	

TOTAL OF 17 ITEMS

LOUISIANA POWER AND LIGHT  
WATERFORD STEAM ELECTRIC STATION UNIT NO. 3  
INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS

EXAMINATION CATEGORY B-D

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B14.10	Welds in CRD Housing (Upper)	32	Volumetric or Surface	
	Welds in CRD Housing (Lower)	32	Volumetric or Surface	

TOTAL OF 64 ITEMS

LOUISIANA POWER AND LIGHT  
WATERFORD STEAM ELECTRIC STATION UNIT NO. 3  
INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS  
EXAMINATION CATEGORY B-P

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Reactor Vessel			
B15.10	Pressure Retaining Boundary	Note 1	Visual, VT-2	
B15.11	Pressure Retaining Boundary	Note 2	Visual, VT-2	
	Pressurizer			
B15.20	Pressure Retaining Boundary	Note 1	Visual, VT-2	
B15.21	Pressure Retaining Boundary	Note 2	Visual, VT-2	
	Steam Generators			
B15.30	Pressure Retaining Boundary	Note 1	Visual, VT-2	
B15.31	Pressure Retaining Boundary	Note 2	Visual, VT-2	
	Heat Exchangers			
B15.40	Pressure Retaining Boundary	-	-	
B15.41	Pressure Retaining Boundary	-	-	
	Piping			
B15.50	Pressure Retaining Boundary	Note 1	Visual, VT-2	
B15.51	Pressure Retaining Boundary	Note 2	Visual, VT-2	
	Pumps			
B15.60	Pressure Retaining Boundary	Note 1	Visual, VT-2	
B15.61	Pressure Retaining Boundary	Note 2	Visual, VT-2	
	Valves			
B15.70	Pressure Retaining Boundary	Note 1	Visual, VT-2	
B15.71	Pressure Retaining Boundary	Note 2	Visual, VT-2	

NOTES:

- (1) The pressure retaining boundary during the system leakage test shall correspond to the reactor coolant system boundary with all valves in the normal position which is required for normal reactor operation startup. The VT-2 examination shall, however, extend to and include the second closed valve at the boundary extremity.
- (2) The pressure retaining boundary during the system hydrostatic test shall include all Class 1 components with the system boundary.



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EXAMINATION CATEGORY B-Q

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
B16.10	Steam Generator Tubing in Straight Tube Design	-	-	
B16.20	Steam Generator Tubing in U-Tube Design	18,700	Volumetric	Per LP&L Tech Specs 4.4.4

TOTAL OF 18,700 ITEMS

### 3.0 INSERVICE INSPECTION OF CLASS 2 COMPONENTS

Based on Table IWC-2500-1, the examination categories and items identified in the Examination Table are subject to examination under LP&L's Inservice Inspection Program. The Examination Table identifies the non-exempt components subject to examination, the total number of items under each category, and any Relief Requests associated with each item. All welds whose stress levels exceed that shown in IWC-2500-1 (Cat C-F) are examined. Additional details regarding exemptions and system pressure tests are addressed below.

#### 3.1 Exemptions (IWC)

The following exemptions apply to all applicable categories of IWC-2500-1. Also, the selection of supports under IWF is affected.

3.1.1 IWC-1220(A): As allowed by this paragraph, all Class 2 systems or portions of systems that during normal plant operation are not required to operate or perform a system function but remain flooded under static conditions at a pressure of at least 80% of the pressure that the component or system will be subjected to when required to operate are exempt from this program. This exemption applies to the (4) Four Safety Injection Tanks which during normal operation remain flooded under static conditions at 100% of the pressure that the tanks will be subjected to when required to operate.

3.1.2 IWC-1220(B): As allowed by this paragraph, all Class 2 components of systems or portions of systems, other than Residual Heat Removal Systems and Emergency Core Cooling Systems, that are not required to operate above a pressure of 275 psig or above a temperature of 200°F (93°C) are exempt. This exemption applies to the following Class 2 lines:

2CS10-12A	2CC8-88A1
2CS10-12B	2CC8-88A2
2CS6-13A	2CC8-91B1
2CS6-13B	2CC8-91B2
2CS8-14A	2CC10-151A/B
2CS8-14B	2CC10-153A/B
2CS6-15A	2CC8-157A1
2CS6-15B	2CC8-157A2
2CS6-16A	2CC8-158B1
2CS6-16B	2CC8-158B2
2CS6-18A	2FS6-64A/B
2CS6-18B	2SA10-103

3.1.3 IWC-1220(C): As allowed by this paragraph, all Class 2 component connections (including nozzles in vessels and pumps), piping and associated valves, and vessels and their attachments that are 4 inch nominal pipe size and smaller are exempt from this program. This exemption applies to all piping  $\leq$  4" nominal pipe size.

### 3.2 System Pressure Tests (IWC)

As required by Tables IWA-5210-1 and IWC-2500-1 the system pressure tests described in IWA-5211 are conducted as follows:

## 3.2.1 Hydrostatic Testing (IWA-5211d)

The hydrostatic testing requirements of IWC-2500 are required to be performed at or near the end of each inspection interval. The procedures detailing the hydrostatic testing and any Relief Requests associated with these tests will be developed during the second period of the first Interval. All hydrostatic testing required due to repair/replacement activity is handled on a case by case basis. The hydrostatic tests and associated repair/replacement activities are documented on NIS-II forms which are submitted with an Outage Summary Report to be filed after refueling outages.

## 3.2.2 System Functional Test (IWA-5211b)

During each inspection period, the Class 2 pressure boundary of those systems or portions of systems not required to operate during normal reactor operation is subjected to a visual exam (VT-2) while at the pressure obtained during the system or component functional tests. The pressure retaining boundary extends up to and including the first normally closed valve or valve capable of automatic closure when the safety function is required.

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EXAMINATION CATEGORY C-A

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
C1.10	Shell Circumferential Welds	10	Volumetric	
C1.20	Head Circumferential Welds	4	Volumetric	
C1.30	Tubesheet-to-Shell Weld	4	Volumetric	

TOTAL OF 18 ITEMS



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EXAMINATION CATEGORY C-B

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
C2.10	Nozzles in Vessels $\leq$ 1/2 in. Nominal Thickness			
C2.11	Nozzle-to-Shell (or Head) Weld	-	-	
C2.20	Nozzles Without Reinforcing Plate in Vessels $>$ 1/2 in. Nominal Thickness			
C2.21	Nozzle-to-Shell (or Head) Weld	4	Volumetric & Surface	
C2.22	Nozzle Inside Radius Section	4	Volumetric	
C2.30	Nozzles With Reinforcing Plate in Vessels $>$ 1/2 in. Nominal Thickness			
C2.31	Reinforcing Plate Welds to Nozzle and Vessel	8	Surface	
C2.32	Nozzle-to-Shell (or Head) Welds Inside of Vessel Accessible	-	-	
	Inside of Vessel Inaccessible	4	Visual, VT-2	

TOTAL OF 20 ITEMS

LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY C-C

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Pressure Vessels			
C3.10	Integrally Welded Attachments	8	Surface	
	Piping			
C3.20	Integrally Welded Attachments	24	Surface	
	Pumps			
C3.30	Integrally Welded Attachments	6	Surface	
	Valves			
C3.40	Integrally Welded Attachments	-	-	

TOTAL OF 38 ITEMS

LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY C-D

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Pressure Vessels			
C4.10	Bolts and Studs	-	-	
	Piping			
C4.20	Bolts and Studs	-	-	
	Pumps			
C4.30	Bolts and Studs	-	-	
	Valves			
C4.40	Bolts and Studs	-	-	

TOTAL OF 0 ITEMS

LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY C-F

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
C5.10	Piping Welds < 1/2 in. Nominal Wall Thickness			
C5.11	Circumferential Weld	503	Surface	Relief Request ISI-001, ISI-002
C5.12	Longitudinal Weld	81	Surface	
C5.20	Piping Welds > 1/2 in. Nominal Wall Thickness			
C5.21	Circumferential Weld	229	Volumetric & Surface	Relief Request ISI-001
C5.22	Longitudinal Weld	30	Volumetric & Surface	Relief Request ISI-001
C5.30	Pipe Branch Connections > 4 in. Nominal Branch Pipe Size			
C5.31	Circumferential Weld	3	Surface	
C5.32	Longitudinal Weld	-	-	

TOTAL OF 846 ITEMS

LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY C-G

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Pumps			
CG.10	Pump Casing Welds	-	-	
	Valves			
C6.20	Valve Body Welds	4	Surface	

TOTAL OF 4 ITEMS



LOUISIANA POWER AND LIGHT  
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EXAMINATION CATEGORY C-H

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
	Pressure Vessels			
C7.10	Pressure Retaining Components	Note 1	Visual, VT-2	
C7.20	Pressure Retaining Components	Note 1	Visual, VT-2	
	Piping			
C7.30	Pressure Retaining Components	Note 1	Visual, VT-2	
C7.40	Pressure Retaining Components	Note 1	Visual, VT-2	
	Pumps			
C7.50	Pressure Retaining Components	Note 1	Visual, VT-2	
C7.60	Pressure Retaining Components	Note 1	Visual, VT-2	
	Valves			
C7.70	Pressure Retaining Components	Note 1	Visual, VT-2	
C7.80	Pressure Retaining Components	Note 1	Visual, VT-2	

NOTES:

- (1) The pressure retaining boundary includes only those portions of the system required to operate or support the safety system function up to and including the first normally closed valve (including a safety or relief valve) or valve capable of automatic closure when the safety function is required.

#### 4.0 INSERVICE INSPECTION OF CLASS 3 COMPONENTS (IWD)

Based on ASME Section XI, Table IWD-2500-1, the examination categories and items identified in the following Examination Table are applicable to the Waterford 3 Inservice Inspection Program. Under the rules of IWF, examination of the entire support is required when the components are required to be examined by IWD. The IWD and IWF examination boundaries are specified in Fig. IWF-1300-1. Ultimately, the rules of the two articles require the same type of examination for the entire support. Therefore, LP&L establishes the examination category for the integral attachment (IWD) portion of the support based on the IWF-2500-1 category applicable to the remainder of the support. The Class 3 supports are shown under Category F-A, F-B or F-C. (See Relief Request No. ISI-005 and the Examination Table). With this approach, all of the required support examinations are performed as required by the ASME code, and the process of categorization and scheduling is greatly simplified.

#### 4.1 Exemptions

The following exemptions apply to all applicable categories of IWD-2500-1. Selection of supports under IWF is affected.

- 4.1.1 IWD-1220.1: As allowed by this paragraph, all Class 3 integral attachments of supports and restraints to components that are 4 inch nominal pipe size and smaller except for Emergency Feedwater (the Waterford 3 equivalent of Auxiliary Feedwater) are exempt from this program. Louisiana Power & Light will apply this exemption to all Class 3 lines  $\leq 4"$  with the exception of the following Emergency Feedwater lines:

EFW SYSTEM (  $\leq 4$ " )

Line No.

3FW4-76A

3FW4-77B

3FW4-46

3FW4-47

3FW1 $\frac{1}{2}$ -61

3CD4-67A

3CD4-68B

4.1.2 IWD-1220.2: As allowed by this paragraph, integral attachments of supports and restraints to components exceeding 4 inch nominal pipe size may be exempted from the visual examination (VT-3) of Table IWD-2500-1 provided:

- (A) The components are located in systems (or portions of systems) whose function is not required in support of Reactor Residual Heat Removal, Containment Heat Removal, and Emergency Core Cooling.
- (B) The components operate at a pressure of 275 psig or less and at a temperature of 200°F (93°C) or less.

Louisiana Power & Light will apply this exemption to the following Class 3 lines:

LINE NO.

3CC20-107A/B

3CC12-67A/B

3CC18-156A/B

3CC16-161A (From 3CC20-107A/B to 3CC-F120A)

3CC16-161B (From 3CC20-107A/B to 3CC-F121B)

3CC18-11A/B

3CC16-148A/B (From 3CC-F122A to 3CC-F123B to reducer at 3CC18-11A/B)

LINE NO.

3CC14-113A/B

3CC18-243A/B

3CC18-242A/B

3CC14-133A/B

3CC12-372A/B

3CC14-134A/B

3CC10-154A/B

<u>LINE NO.</u>	<u>LINE NO.</u>
3CC8-139A/B	3CD8-124
3CC8-119A/B	3FS10-2A
3CC6-142A/B	3FS10-3B
3CC10-68A/B	3FS12-1A/B
3CC10-152A/B	3FS10-5B
3CC10-13A/B	3FS10-4A
3CC10-21B1	3FS12-6A/B
3CC10-51B1	3FS12-7A/B
3CC10-66A/B	3FS12-51A/B
3CC10-15A1	3FS10-76A/B
3CC10-33B2	3FS10-77A/B
3CC10-78A/B	3FS6-66A/B
3CC10-57A2	3SI16-41A
3CC6-39A/B	3SI16-41B
3CC6-317	3SI6-46A/B
3CC6-12A/B	3SI6-47A/B
3CC12-130A/B	3SI6-48A/B
3CC10-45A1	3SI6-180A
3CC10-63B2	3SI6-180B
3CC12-371A/B	
3CC10-27A2	

#### 4.2 System Pressure Tests

As required by Tables IWA-5210-1 and IWD-2500-1 the system pressure tests described in IWA-5211 are conducted as follows:

4.2.1 Hydrostatic Testing (IWA-5211d)

The hydrostatic testing requirements of IWD-2500 are required to be performed at or near the end of each inspection interval. The procedures detailing the hydrostatic testing and any Relief Requests associated with these tests will be developed during the second period of the first Interval. All hydrostatic testing due to repair or replacement activity is handled on a case by case basis.

4.2.2 Inservice Test (IWA-5211c)

During each inspection period, the Class 3 pressure boundary is subjected to a visual exam (VT-2) with the system(s) in service under operating pressure. The pressure retaining boundary extends up to and including the first normally closed valve or valve capable of automatic closure to perform the safety-related system function.



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INSERVICE INSPECTION PROGRAM FOR CLASS 1, 2, AND 3 COMPONENTS

EXAMINATION CATEGORY D-A

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
D1.10	Pressure Retaining Components	Note 1	Visual, VT-2	
	Pressure Retaining Components	Note 1	Visual, VT-2	
D1.20	Integral Attachment- Component Supports and Restraints	Note 2	Visual, VT-3	Relief Request ISI-005
D1.30	Integral Attachment- Mechanical and Hydraulic Snubbers	Note 2	Visual, VT-3	Relief Request ISI-005
D1.40	Integral Attachment- Spring Type Supports	Note 2	Visual, VT-3	Relief Request ISI-005
D1.50	Integral Attachment- Constant Load Type Supports	Note 2	Visual, VT-3	Relief Request ISI-005
D1.60	Integral Attachment- Shock Absorbers	Note 2	Visual, VT-3	Relief Request ISI-005

NOTES:

- (1) The system boundary extends up to and including the first normally closed valve or valve capable of automatic closure as required to perform the safety-related system function.
- (2) See Section 4 of this report titled "Inservice Inspection of Class 3 Components" for categorization of IWD integral attachments.

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EXAMINATION CATEGORY D-B

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
D2.10	Pressure Retaining Components	Note 1	Visual, VT-2	
	Pressure Retaining Components	Note 1	Visual, VT-2	
D2.20	Integral Attachment- Component Supports and Restraints	Note 2	Visual, VT-3	Relief Request ISI-005
D2.30	Integral Attachment- Mechanical and Hydraulic Snubbers	Note 2	Visual, VT-3	Relief Request ISI-005
D2.40	Integral Attachment- Spring Type Supports	Note 2	Visual, VT-3	Relief Request ISI-005
D2.50	Integral Attachment- Constant Load Type Supports	Note 2	Visual, VT-3	Relief Request ISI-005
D2.60	Integral Attachment- Shock Absorbers	Note 2	Visual, VT-3	Relief Request ISI-005

NOTES:

- (1) The system boundary extends up to and including the first normally closed valve or valve capable of automatic closure as required to perform the safety-related system function.
- (2) See Section 4 of this report titled "Inservice Inspection of Class 3 Components" for categorization of IWD integral attachments.

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EXAMINATION CATEGORY D-C

ITEM NO.	AREAS EXAMINED	TOTAL PER ITEM	EXAMINATION METHOD	RELIEF/COMMENTS
D3.10	Pressure Retaining Components	Note 1	Visual, VT-2	
	Pressure Retaining Components	Note 1	Visual, VT-2	
D3.20	Integral Attachment- Component Supports and Restraints	Note 2	Visual, VT-3	Relief Request ISI-005
D3.30	Integral Attachment- Mechanical and Hydraulic Snubbers	Note 2	Visual, VT-3	Relief Request ISI-005
D3.40	Integral Attachment- Spring Type Supports	Note 2	Visual, VT-3	Relief Request ISI-005
D3.50	Integral Attachment- Constant Load Type Supports	Note 2	Visual, VT-3	Relief Request ISI-005
D3.60	Integral Attachment- Shock Absorbers	Note 2	Visual, VT-3	Relief Request ISI-005

NOTES:

- (1) The system boundary extends up to and including the first normally closed valve or valve capable of automatic closure as required to perform the safety-related system function.
- (2) See Section 4 of this report titled "Inservice Inspection of Class 3 Components" for categorization of IWD integral attachments.

5.0 INSERVICE INSPECTION OF SUPPORTS (IWF)

Based on Table IWF-2500-1, the examination categories and items identified in the Examination Table are subject to examination under LP&L's Inservice Inspection Program. The total numbers of items on the table reflect the totals of the Class 1, 2 and 3 supports.

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EXAMINATION CATEGORY F-A

ITEM NO.	AREAS EXAMINED	EXAMINATION METHOD	RELIEF/COMMENTS
F1.10	Mechanical Connections to Pressure Retaining Components and Building Structure	Visual, VT-3	
F1.20	Weld Connections to Building Structure	Visual, VT-3	
F1.30	Weld and Mechanical Connections at Intermediate Joints in Multiconnected Integral and Nonintegral Supports	Visual, VT-3	
F1.40	Component Displacement Settings of Guides and Stops, Misalignment of Supports, Assembly of Support Items	Visual, VT-3	

TOTAL OF 24 SUPPORTS



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EXAMINATION CATEGORY F-B

ITEM NO.	AREAS EXAMINED	EXAMINATION METHOD	RELIEF/COMMENTS
F2.10	Mechanical Connections to Pressure Retaining Components and Building Structure	-	
F2.20	Weld Connections to Building Structure	-	
F2.30	Weld and Mechanical Connections at Intermediate Joints in Multiconnected Integral and Nonintegral Supports	-	
F2.40	Component Displacement Settings of Guides and Stops, Misalignment of Support, Assembly of Support Items	-	

TOTAL OF 0 SUPPORTS

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EXAMINATION CATEGORY F-C

ITEM NO.	AREAS EXAMINED	EXAMINATION METHOD	RELIEF/COMMENTS
F3.10	Mechanical Connections to Pressure Retaining Components and Building Structure	Visual, VT-3	Relief Request ISI-006, ISI-007, ISI-008, ISI-009, and ISI-010
F3.20	Weld Connections to Building Structure	Visual, VT-3	Relief Request ISI-006, ISI-007, ISI-008, ISI-009, and ISI-010
F3.30	Weld and Mechanical Connections at Intermediate Joints in Multiconnected Integral and Nonintegral Supports	Visual, VT-3	Relief Request ISI-006, ISI-007, ISI-008, ISI-009, and ISI-010
F3.40	Component displacement settings of Guides and Stops, Misalignment of Supports, Assembly of Support Items	Visual, VT-3	Relief Request ISI-006, ISI-007, ISI-008, ISI-009, and ISI-010
F3.50	Spring Type Supports, Constant Load Type Supports, Shock Absorbers, Hydraulic and Mechanical Type Snubbers	Visual, VT-4	

TOTAL OF 1429 SUPPORTS

6.0 INSERVICE TESTING OF PUMP AND VALVES

The Pump & Valve Inservice Test Plan and all Relief Requests associated with those tests are being conducted under the LP&L Pump and Valve Inservice Testing Program which was submitted previously (submitted to NRC via letter NO. W3P84-3473 dated 1/11/85).

## 7.0 RELIEF REQUEST

Louisiana Power and Light requests that relief be granted from ASME Section XI requirements pursuant to Section 50.55a(g)(6)(i) of 10CFR50. The following Relief Requests document the areas where full compliance with Section XI requirements is not practical/possible during Inservice Examinations. Additional Relief Requests may be generated during the service life of the unit, as needed.

<u>RELIEF REQUEST</u>	<u>REVISION</u>	<u>DESCRIPTION</u>
ISI-001	0	Partial Examination of Piping Welds
ISI-002	0	Supplemental Examination for IGSCC
ISI-003	0	VT-3 Examinations on Valve Intervals
ISI-004	0	Reactor Coolant Pump Casing Welds
ISI-005	0	Categorization of IWD into IWF
ISI-006	0	Support Access is Completely Blocked by Thermal Insulation
ISI-007	0	Supports are in Fire Seal
ISI-008	0	Supports are in Penetration
ISI-009	0	Support Blocked by Thermal Insulation (Partially)
ISI-010	0	Support Blocked by Fire/Heat Insulation

A. Subject

Request for Relief No. ISI-001 Rev. 0

B. Component Classification

- Class 1 and 2
- Code Examination Category B-J, C-F (All items)

C. Examination Requirement

Category B-J - A surface exam of the O.D. and volumetric examination of the lower one-third of the weld and HAZ is required for all piping 4" nominal pipe size and greater. A surface examination is required for pipe less than 4" pipe diameter.

Category C-F - Surface and volumetric examination of circumferential and longitudinal butt welds for all piping greater than 4" nominal pipe size with a wall thickness greater than 0.5". A surface examination only is required for all piping greater than 4" nominal pipe size with a wall thickness of 0.5" or less.

D. Relief Requested

Louisiana Power and Light is requesting that relief be given in reference to obtaining 100% coverage when examining certain items scheduled in IWB-2500-1 (Cat. B-J) and IWC-2500-1 (Cat. C-F).

E. Basis for Relief

The design of Class 1 and 2 piping systems have welded joints such as pipe to elbow and pipe to component which physically obstruct all or part of the required Section XI examinations from the elbow or component side of the weld. Partial examinations are done whenever full coverage is not possible. Alternate analyses, search units, vee paths and other techniques will be used to provide additional coverage. During PSI, Louisiana Power and Light generated a detailed summary of the ASME Class 1 and 2 piping system welds that received limited or partial examination. The Summary Report identifies the specific weld, the corresponding isometric drawing, the required examination method, the specific cause for the partial examination, the region of the weld which can actually be examined and alternative examinations employed (if any).



E. (cont'd)

This Summary Report is contained in the Preservice Report and will be used during the first Interval as a reference for partially examined welds.

Louisiana Power and Light has determined that the partial examinations to be performed, the examinations performed during fabrication, and the periodic hydrostatic test to be performed will demonstrate an acceptable level of structural integrity.

F. Schedule for Implementation

First 10 year Interval

A. Subject

Request for Relief No. ISI-002 Rev. 0

B. Component Classification

Class 2

Code Examination Category C-F

C. Examination Requirement

A surface examination is required for piping with a wall thickness of 0.5" or less. The examination shall be done to the extent and frequency as specified in IWC-2500-1 (Cat. C-F).

D. Relief Requested

Perform ultrasonic examinations on 10% of the welds on certain Safety Injection and Containment Spray lines in lieu of the surface examinations required by IWC-2500-1 (Cat. C-F).

E. Basis for Relief

During PSI, members of the NRC staff expressed concern to Louisiana Power and Light personnel that strict compliance with Section XI did not adequately address the issue of Intergranular Stress Corrosion Cracking (IGSCC) for much of the piping susceptible to this condition. Therefore, LP&L opted to select approximately 10% of the welds in certain suction lines of Safety Injection and Containment Spray systems for ultrasonic examinations in lieu of surface examinations. Every effort was made to select a representative cross-section of weld types with particular emphasis placed on areas where structural discontinuities were present.

## E. (cont'd)

The following is a list of all lines which are selected for this program:

2SI10-5B	2SI24-2A
2SI10-16B	2SI20-4A
2SI10-15B	2SI14-23A
2SI14-23B	2CS14-2A
2CS14-2B	2SI10-5A
2SI20-4B	2SI10-15A
2SI10-16A	2SI10-15 A/B
2SI24-2B	2SI24-3B

F. Schedule for Implementation

First 10 year Interval

A. Subject

Request for Relief No. ISI-003 Rev. 0

B. Component Classification

- Class 1
- Code Examination Category B-M-2 (Item B12.50)

C. Examination Requirement

A VT-3 internal examination shall be performed on one valve within each group of valves each inspection interval.

D. Relief Requested

Relief is requested to defer the required internal examination on valves bodies which exceed 4" nominal pipe size until maintenance/disassembly is required.

E. Basis for Relief

The Code requirement to disassemble one valve from each design group for the purpose of visual examinations has a small potential for identification of service induced flaws or degradation. The industry performance of these valves has proved their excellent ability to resist service degradation or flawing. The inappropriate balance of potential flaw detection and the large impact on expenditures of manpower without substantially increasing component reliability is considered impractical. Also, the substantial expenditures of man-rem without increasing component integrity is undesirable due to ALARA concerns. As an alternative, these examinations will be performed when disassembly is required for maintenance purposes, but not more than once per inspection interval. LP&L has determined that delay of these examinations until maintenance is performed will not affect the function or integrity of these components.

F. Schedule for Implementation

First 10 year Interval

A. Subject

Request for Relief No. ISI-004 Rev. 0

B. Component Classification Class 1

C. Examination Requirement

1. Table IWB-2500-1, Category B-L-1, Item B12.10-

All pressure retaining welds for one pump from each group of pumps performing a similar function in a system shall receive 100% volumetric examination.

2. Table IWB-2500-1, Category B-L-2, Item B12.20-

The internal pressure boundary surface of one pump from each group of pumps performing a similar function in a system shall receive 100% visual (VT-3) examination.

D. Relief Requested

1. Total relief from the volumetric examination of C.1 above is requested (See Alternate Exams).

2. Relief from the frequency and extent of visual examination of C.2 above is requested (See Alternate Exams).

E. Alternate Exams

1. In lieu of volumetric examination:

100% visual (VT-1) examination of the external surface(s) of all pressure retaining welds shall be performed to the extent and frequency of Table IWB-2500-1, Category B-L-1, Item B12.10.

2. In lieu of 100% visual examination:

In the event that pump disassembly is required for maintenance purposes, 100% visual (VT-3) examination of the accessible internal surfaces of all pressure retaining welds shall be performed to the extent and frequency of Table IWB-2500-1, Category B-L-2, Item B12.20.



#### F. Basis For Relief

The pump casings are fabricated with SA-351 CF8M austenitic stainless steel castings using type 308 filler metal which contains 5 to 25 percent and 5 to 18 percent delta ferrite respectively. The presence of delta ferrite provides resistance to IGSCC and improves pitting resistance. To date, the pump manufacturer and the NSSS supplier report no documented instances where repairs to pump casings were necessitated by pump casing material failure or unacceptable volumetric examination results. Therefore, volumetric examination provides little or no additional safety margin.

The duplex microstructure of the austenitic pump casing and weld metal prevents performance of meaningful ultrasonic (UT) examination. Even when using state of the art UT examination techniques, indications are effectively masked by the "noise" created from the microstructure. UT is not an acceptable method for volumetric examination.

To perform radiographic examination, complete disassembly of the pump is required. There is no requirement to disassemble the pump for any scheduled normal maintenance. Industry experience indicates a very low probability of complete disassembly for non-routine maintenance. Should pump disassembly be performed solely for the purpose of radiographic examination, the potential for substantial man-rem exposure is high. The man-hours expended in pump disassembly/assembly and the accompanying man-rem exposure will not provide any additional safety margin and therefore constitutes undue hardship.

The alternate examinations proposed represent the most reasonable and meaningful technique considering the low potential for problems. A surface exam method (dye penetrant) was considered but extensive preparation of the cast pump surface is required with no significant increase in the likelihood that indications would be revealed. The system leakage test and system hydrostatic test required by IWB-2500-1, Category B-P, Items 15.60 and B15.61 respectively provide further assurance of pressure boundary integrity.

#### G. Schedule for Implementation

First 10 year Interval

A. Subject

Request for Relief No. ISI-005 Rev. 0

B. Component Classification Class 3 Component Supports

C. Examination Requirement

Table IWD-2500-1 requires visual (VT-3) examination of support integral attachments. Paragraph IWF-2510 requires examination of supports of components required to be examined under IWD. Figure IWF-1300-1 establishes IWD and IWF examination boundaries.

D. Relief Requested

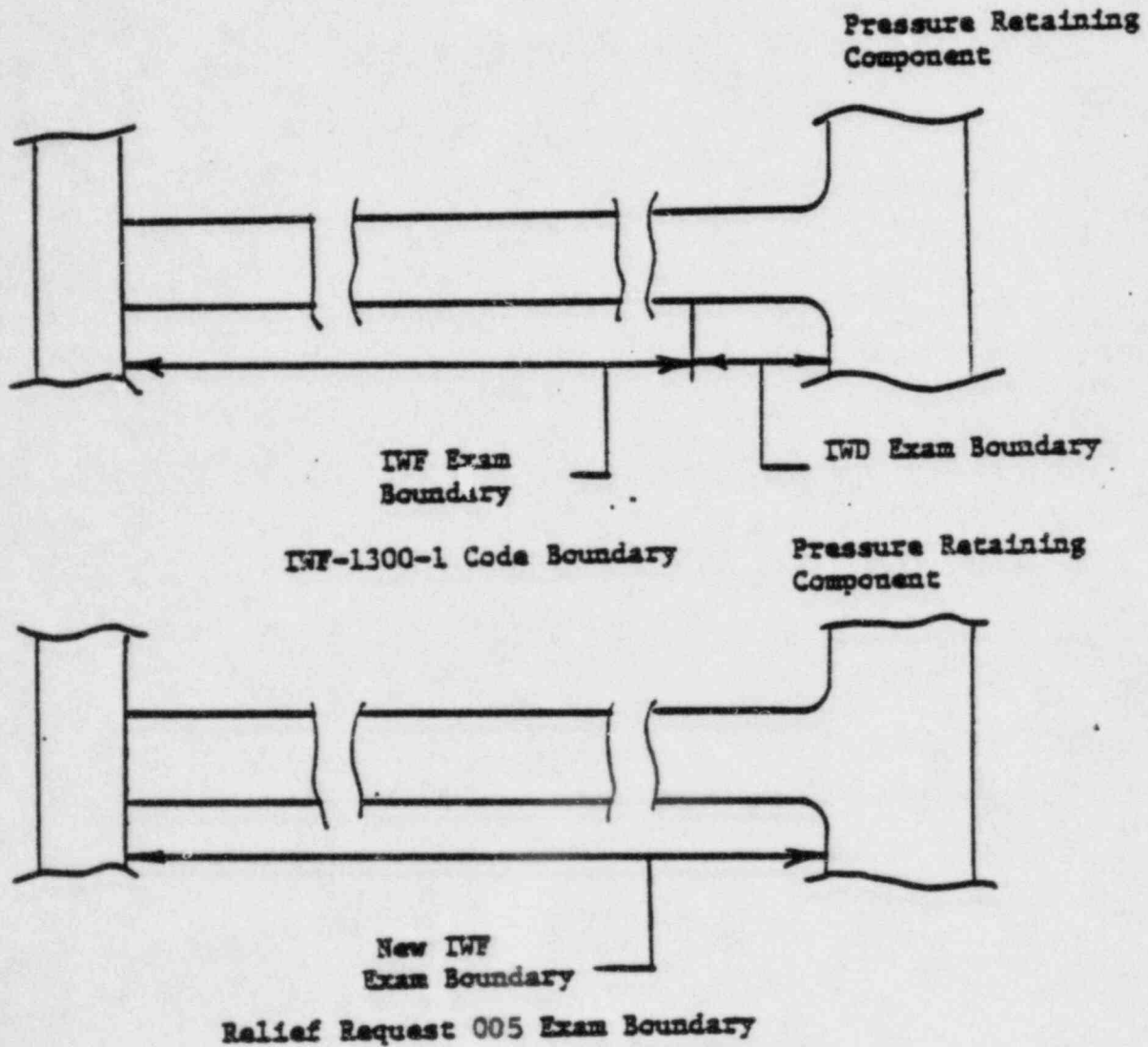
Relief is requested from the examination boundaries of Figure IWF-1300-1 for supports addressed by C above.

E. Basis for Relief

In lieu of the examination boundaries of IWF-1300-1, the entire support, including the integral attachment, is classified as an IWF support examination boundary (see sketch on Attachment 1). This does not affect the number of supports selected, the examination method or the extent of the examination. However, categorization and scheduling is performed under the requirements of one article (IWF-2000) negating the undue hardship of implementing both Articles IWD and IWF.

F. Schedule for Implementation

First 10 year Interval



A. Subject

Request for Relief No. ISI-006 Rev. 0

B. Component Classification Class 3 Component Supports

C. Examination Requirement

Table IWF-2500-1, Category F-C, Items F3.10 through F3.40 - Mechanical connections to pressure boundaries and building structures, weld connections to building structures, weld and mechanical connections at intermediate joints and support assembly and alignment shall be 100% visual (VT-3) examined.

D. Relief Requested

Total relief from the visual examination of C above is requested for the supports listed in Attachment 1.

E. Basis for Relief

Component support access is completely blocked by permanent non-removable insulation. Supported lines operate at temperatures substantially below ambient and are, therefore, subject to severe condensation. The type of insulation used has a permanently sealed vapor barrier to exclude moisture, and removal of the insulation in the support area results in vapor contamination of the surrounding insulation. Possible alternate removable type vapor barrier insulation is not acceptable due to fluoride/chloride content. The requirement for a vapor barrier necessitates non-removable insulation. During the construction phase, examinations were conducted to verify acceptability of the entire component support installation in accordance with the applicable construction codes. Examination records are on file by support number.

F. Schedule for Implementation

First 10 year Interval

Component(s) - Supports listed below

System(s) - Chilled Water (AC)

Relief - Inaccessibility - Restraint access completely blocked by permanent thermal insulation.

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
ACR-513	3AC8-7A, 14A	3
ACR-515	3AC8-7A, 14A	3
ACR-1034	3AC10-15A	3
ACR-561	3AC6-28B, 29B	3
ACR-563	3AC6-28B, 29B	3
ACR-551	3AC6-40A	3
ACR-408	3AC6-41A, 42A	3
ACR-410	3AC6-41A, 42A	3
ACR-419	3AC6-41A, 42A	3
ACR-1036	3AC6-42A	3
ACR-1131	3AC6-43B	3
ACR-523	3AC6-52A	3
ACR-522	3AC6-53A	3
ACR-1058	3AC6-40A	3
ACR-570	3AC6-43B	3
ACR-1087	3AC6-40B	3



A. Subject

Request for Relief No. ISI-007 Rev. 0

B. Component Classification

Class 2 and 3 Component Supports

C. Examination Requirement

Table IWF-2500-1, Category F-C, Items F3.10 through F3.40 - Mechanical connections to pressure boundaries and building structures, weld connections to building structures, weld and mechanical connections at intermediate joints and support assembly and alignment shall be 100% visual (VT-3) examined.

D. Relief Requested

Total relief from the visual examination of C above is requested for the supports listed in Attachment 1.

E. Basis for Relief

Component supports are in penetrations which are closed off by permanently installed fire seals. Fire seal material is pumped into the penetration in semi-liquid state and solidifies into a non-removable mass. Fire seal integrity is a Limiting Condition for Operation as identified in W-3 Technical Specification paragraph 3.7.11. This constitutes undue hardship in conducting exams.

During the construction phase, examinations were conducted to verify acceptability of the component support installations in accordance with the applicable construction code(s). Examination records are on file by support number.

F. Schedule for Implementation

First 10 year Interval

Component(s) - Supports listed below

System(s) - Chilled Water (AC), Component Cooling (CC)

Relief - Inaccessibility - Restraint in penetration with permanent fire seal.

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
ACR-413	3AC6-41A	3
ACR-600	3AC6-41B	3
ACR-412	3AC6-42A	3
ACR-601	3AC6-42B	3
CCRR-781	3CC20-2B	3
CCRR-712	3CC20-3B	3
CCRR-932	3CC6-6A	3
CCRR-465	3CC6-71A	3
CCRR-471	3CC6-71A	3
CCRR-119	3CC10-83A	3
CCRR-1072	3CC6-106A	3
CCRR-1111	3CC6-106A	3
CCRR-1091	3CC6-106E	3
CCRR-37	3CC6-144A/B	3
CCRR-420	3CC16-202B	3
CCRR-1121	3CC10-289A	3
CCRR-1122	3CC10-290B	3
CSRR-361	2CS10-7B	2
CSRR-372	2CS10-9B	2
CSRR-334	2CS10-11A	2
SIRR-391	2SI8-113RL1A	2
SIRR-939	2SI8-130RL2A	2
CCRR-621	3CC16-203A	3
FWRR-262	3FW4-76A	3

A. Subject

Request for Relief No. ISI-008 Rev. 0

B. Component Classification

Class 3 Component Supports

C. Examination Requirement

Table IWF-2500-1, Category F-C, Items F3.10 through F3.40 - Mechanical connections to pressure boundaries and building structures, weld connections to building structures, weld and mechanical connections at intermediate joints, and support assembly and alignment shall be 100% visual (VT-3) examined.

D. Relief Requested

Total relief from the visual examination of C above is requested for the supports listed in Attachment 1.

E. Basis for Relief

Component supports are in penetrations such that supports are completely inaccessible for examination. During the construction phase, examinations were conducted to verify acceptability of the component support installations in accordance with the applicable construction code(s). Examination records are on file by support number.

F. Schedule for Implementation

First 10 year Interval.

Component(s) - Supports listed below

System(s) - Chilled Water (AC) and Component Cooling (CC)

Relief - Geometric Inaccessibility - Restraint in Penetration.

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
ACR-586	3AC6-41A	3
ACR-587	3AC6-42A	3
CCRR-715	3CC20-2B	3
CCRR-526	3CC20-107A	3
CCRR-445	3CC20-201B	3

A. Subject

Request for Relief No. ISI-009 Rev. 0

B. Component Classification

Class 3 Component Supports

C. Examination Requirement

Table IWF-2500-1, Category F-C, Items F3.10 through F3.40 - Mechanical connections to pressure boundaries and building structures, weld connections to building structures, weld and mechanical connections at intermediate joints and support assembly and alignment shall be 100% visual (VT-3) examined.

D. Relief Requested

Partial relief is requested for the supports listed in Attachment 1 where the supports connect to the pressure boundary.

E. Alternate Exams

The accessible portions of the affected supports are examined to the frequency and extent specified in IWF-2500-1 and IWF-2510.

F. Basis for Relief

Component support access is partially blocked by permanent non-removable insulation. Supported lines operate at temperatures substantially below ambient and are, therefore, subject to severe condensation. The type of insulation used has a permanently sealed vapor barrier to exclude moisture, and removal of the insulation in the support area results in vapor contamination of the surrounding insulation. Possible alternate removable type vapor barrier insulation is not acceptable for use due to high fluoride/chloride content. The requirement for a vapor barrier seal necessitates non-removable insulation.

During the construction phase, examinations were conducted to verify acceptability of the entire component support installation in accordance with the applicable construction codes. Examination records are on file by support number.

G. Schedule for Implementation

First 10 year Interval.



Component(s) - Supports listed below

System(s) - Chilled Water (AC)

Relief - Partial Inaccessibility - Restraint access partially blocked by permanent thermal insulation.

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
ACR-453	3AC6-1A/B	3
ACR-442	3AC6-1A, 7B, 14B	3
ACR-459	3AC6-1A, 1A/B, 2B, 19A, 19B, 19A/B	3
ACR-445	3AC6-1B	3
ACV-446	3AC6-1B	3
ACH-475	3AC6-1B	3
ACR-457	3AC6-2A/B, 19A/B	3
ACR-462	3AC6-2A, 2B, 19A, 19B	3
ACR-444	3AC6-2A, 2A/B, 14B 19A, 19A/B	3
ACR-444	3AC6-27B, 92B	3
ACR-444	3AC10-6A, 6B, 15A, 15B	3
ACH-463	3AC6-2B, 19B	3
ACR-1041	3AC10-6A	3
ACR-1042	3AC10-6A	3
ACR-1064	3AC10-6B	3
ACR-455	3AC8-7A	3
ACH-639	3AC8-7A	3
ACR-512	3AC8-7A, 14A	3
ACR-514	3AC8-7A, 14A	3
ACH-640	3AC8-7A, 14A	3
ACH-534	3AC6-7B	3
ACR-476	3AC6-7B, 14B	3
ACR-497	3AC6-7B, 14B	3
ACR-499	3AC6-7B, 14B	3
ACR-535	3AC6-7B, 14B	3
ACR-536	3AC6-7B, 14B	3

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
ACR-454	3AC8-14A	3
ACR-533	3AC6-14B	3
ACR-1040	3AC10-15A	3
ACH-460	3AC6-19A/B	3
ACR-452	3AC6-19A/B, 22A/B	3
ACR-470	3AC6-21A	3
ACR-450	3AC6-21A/B	3
ACR-471	3AC6-20B	3
ACR-443	3AC6-22A	3
ACR-458	3AC6-22A	3
ACV-472	3AC6-22A	3
ACR-480	3AC6-22A	3
ACV-447	3AC6-22A/B	3
ACR-448	3AC6-22A/B	3
ACR-449	3AC6-22A/B	3
ACV-451	3AC6-22A/B	3
ACR-1100	3AC6-22A/B	3
ACR-441	3AC6-22B	3
ACV-473	3AC6-22B	3
ACR-474	3AC6-22B	3
ACR-478	3AC6-22B	3
ACR-479	3AC6-22B	3
ACR-516	3AC6-28A, 29A	3
ACR-517	3AC6-28A, 29A	3
ACR-540	3AC6-28B, 29B	3
ACH-541	3AC6-28B, 29B	3
ACR-543	3AC6-28B, 29B	3
ACR-544	3AC6-28B, 29B	3
ACR-560	3AC6-28B, 29B	3
ACR-562	3AC6-28B, 29B	3
ACR-564	3AC6-28B, 29B	3
ACR-565	3AC6-28B, 29B	3
ACR-566	3AC6-28B, 29B	3

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
ACH-542	3AC6-29B	3
ACR-1093	3AC6-29B	3
ACR-550	3AC6-40A, 53A	3
ACR-568	3AC6-40B	3
ACR-1088	3AC6-40B	3
ACR-569	3AC6-40B, 43B, 49B	3
ACR-406	3AC6-41A, 42A	3
ACR-407	3AC6-41A, 42A	3
ACR-409	3AC6-41A, 42A	3
ACR-417	3AC6-41A, 42A	3
ACR-421	3AC6-41A, 42A	3
ACR-435	3AC6-41A, 42A	3
ACR-1027	3AC6-41B	3
ACR-425	3AC6-41B, 42B	3
ACR-426	3AC6-41B, 42B	3
ACR-427	3AC6-41B, 42B	3
ACR-431	3AC6-41B,	3
ACH-432	3AC6-41B, 42B	3
ACR-422	3AC6-42A	3
ACR-430	3AC6-42A	3
ACH-434	3AC6-42A	3
ACR-1037	3AC6-42A	2
ACR-428	3AC6-42B	3
ACR-429	3AC6-42B	3
ACR-1019	3AC6-42B	3
ACR-1060	3AC6-42B	3
ACR-559	3AC6-43A, 209A	3
ACR-589	3AC6-209A, 210A	3
ACH-609	3AC6-43A, 209A	3
ACR-612	3AC6-43A, 209A	3
ACR-520	3AC6-52A	3
ACR-524	3AC6-52A, 53A	3
ACR-525	3AC6-52A, 53A	3
ACR-526	3AC6-52A, 53A	3

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
ACR-552	3AC6-52A, 53A	3
ACR-521	3AC6-53A	3
ACR-607	3AC6-209A, 210A	3
ACR-588	3AC6-209A, 210A	3
ACH-573	3AC6-209B	3
ACR-574	3AC6-209B	3
ACR-595	3AC6-209B	3
ACR-596	3AC6-209B	3
ACR-597	3AC6-209B	3
ACR-575	3AC6-209B, 210B	3
ACR-576	3AC6-210B	3
ACR-604	3AC6-210B	3
ACR-605	3AC6-210B	3
ACH-461	3AC6-1A/B	3
ACR-1149	3AC6-1B	3

A. Subject

Request for Relief No. ISI-010 Rev. 0

B. Component Classification

Class 3 Component Supports

C. Examination Requirement

Table IWF-2500-1, Category F-C, Items F3.10 through F3.40 - Mechanical connections to pressure boundaries and building structures, weld connections to building structures, weld and mechanical connections at intermediate joints, and support assembly and alignment shall be 100% visual (VT-3) examined.

D. Relief Requested

Partial relief is requested for the supports listed in Attachment 1 where the supports connect to the building structure.

E. Alternate Exams

The accessible portions of the affected supports are examined to the frequency and extent specified in IWF-2500-1 and IWF-2510.

F. Basis for Relief

Component support access is partially blocked by fire/heat resistant insulation applied to protect supporting structural steel. The insulation is applied by spraying Flamastic or Pyrocrete over a wire mesh support. The insulation solidifies into a non-removable mass approximately 3"-5" thick. Fire barrier integrity is a Limiting Condition for Operation as identified in W-3 Technical Specification paragraph 3.7.11. This constitutes undue hardship in conducting exams.

During the construction phase, examinations were conducted to verify acceptability of the entire component support installation in accordance with the applicable construction codes. Examination records are on file by support number.

G. Schedule for Implementation

First 10 year Interval.



Component(s) - Supports listed below

System(s) - Component Cooling (CC)

Relief - Partial Inaccessibility - Restraint access partially blocked by permanent  
fire/heat insulation.

<u>Support No.</u>	<u>Line No.</u>	<u>Code Class</u>
CCRR-467	3CC6-71A	3
CCRR-468	3CC6-71A	3
CCRR-469	3CC6-71A	3
CCRR-470	3CC6-71A	3
CCRR-1068	3CC6-71A	3
CCRR-529	3CC6-71B	3
CCRR-530	3CC6-71B	3
CCRR-531	3CC6-71B	3