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NED-85-508
1866N

July 18, 1985

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

NRC DOCKET 50-321
OPERATING LICENSE DPR-57
EDWIN I. HATCH NUCLEAR PLANT UNIT 1
INSERVICE INSPECTION RELIEF REQUESTS

Gentlemen:

By letter dated August 12, 1983, Georgia Power Company (GPC) submitted to NRC an updated inservice inspection/inservice testing (ISI/IST) program for Hatch Units 1 and 2 based on NRC verbal recommendations. That submittal updated the ISI/IST programs from the 1974 Edition of the ASME Section XI Code with Addenda through Summer 1975 to the 1980 Edition with Addenda through Winter 1980. After the submittal was made, the examination procedures and plans were updated to the extent practical to meet the later edition of the Code. Since that time, NRC has approved the IST portion of the program with conditions as discussed in the NRC letter dated June 4, 1985. NRC, however, declined to act on the ISI portion of the program for reasons discussed in GPC's letter NED-85-483 dated June 25, 1985.

The aforementioned GPC letter provided a new ten-year ISI/IST program for Hatch Units 1 and 2 since the Hatch Unit 1 first ten-year inspection interval will conclude on December 31, 1985. It is the intention of GPC to complete the examinations for the Hatch Unit 1 first ten-year inspection interval based on the revised Long-Term Examination Plan which implements the ISI Program and was written to the 1980 Edition of ASME Section XI with Addenda through Winter 1980 where practical.

In order to complete the first ten-year inspection interval at Hatch Unit 1, relief from certain of the Code requirements relative to inservice inspection is necessary. Enclosed herein as Attachment 1 are the relief

Recid w/ check for $150.00

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Georgia Power

requests required by GPC for NRC review and approval. Please note that the relief request numbers in Attachment 1 correspond with those in the June 25, 1985 submittal, where applicable. Nineteen (19) copies of this letter and its attachment are provided for your convenience.

The relief requests in Attachment 1 were based on a review of unresolved items in the safety evaluation report issued by NRC letter dated July 29, 1983 for the ISI program written to the 1974 Code, impractical 1980 Code requirements, and other relief as identified. GPC requests that NRC grant the relief requests included in Attachment 1 in accordance with 10 CFR 50.55a (g)(6). The relief requested does not affect public health and safety.

The Hatch Unit 1 maintenance/refueling outage is scheduled to begin November 30, 1985. Because of the extensive pre-outage planning associated with this effort, we respectfully request that questions concerning the enclosed inservice inspection relief requests be brought to our prompt attention. To support our major planning effort, we are seeking your approval within 30 days of the date of this letter. Should you have any questions in this regard, please contact this office at anytime. We will give top priority to responding to your questions.

Pursuant to the requirements of 10 CFR 170, enclosed herein as payment of the application fee for review of the subject relief requests is our check in the amount of $150.00.

Very truly yours,

L. T. Gucwa

JAE/slm

Enclosures: 1. Attachment 1 - Hatch Unit 1 Inservice Inspection Relief Requests
2. Application Fee Check

xc: J. T. Beckham, Jr.
H. C. Nix, Jr.
J. N. Grace (NRC-Region II)
Senior Resident Inspector

ATTACHMENT 1

HATCH UNIT 1 - INSERVICE INSPECTION

RELIEF REQUESTS

07/18/85

2.1.1 Volumetric Examination of Reactor Pressure Vessel and Closure Head Welds

2.1.1.1 Requirement From Which Relief is Requested

Item Nos. B1.11, B1.12, B1.21, and B1.22 of Table IWB-2500-1 for the 1980 Edition of ASME Section XI require the volumetric examination of Reactor Pressure Vessel (RPV) and Closure Head circumferential, longitudinal, and meridional welds. At Hatch, these examinations will be performed using ultrasonic techniques. The applicable examination volumes are shown in Figures IWB-2500-1, -2, and -3. The Code also requires that welds selected for examination are to be examined for essentially 100% of their length. Relief from this requirement is requested.

2.1.1.2 Justification

At Hatch, physical limitations prevent the examination of the entire length of these welds. The 1974 Edition with Addenda through Summer 1975 and earlier editions of the ASME Section XI Code required that the examination cover at least 10% of the length of each longitudinal weld and 5% of the length of each circumferential weld. For Hatch 1, the minimum lengths described above were met for those welds examined previously. For Hatch 1 RPV circumferential and longitudinal welds, approximately 5 to 15% of the total length of the welds are to be examined.

Limitations also exist for the ultrasonic examination of RPV bottom head circumferential and meridional welds. To complete the examinations for the first ten-year interval, the examination coverage for the following welds will still be per the 1974 Edition of the ASME Section XI Code with the following limitations:

Weld No./Description	Coverage/Limitations
C-7 (Bottom Head Torus to Bottom Head Dome Circ. Weld)	5% of weld to be examined; examination will be performed from one side only (bottom head torus side) due to the RPV support skirt
BHT-A,-B,-C,-D,-E,-F,-G, and -H (Bottom Head Torus Meridional Welds)	10% of weld to be examined

The examination of the following welds is not possible due to inaccessibility. The RPV support skirt surrounds these welds and prohibits any examination.

Weld No./Description	Coverage/Limitations
C-8 (Bottom Head Dollar Plate Circumferential Weld)	No examination
BHD-A,-B,-C,-D,-E, and -F (Bottom Head Dome Meridional Welds)	No examination

No known limitations exist for the ultrasonic examination of RPV Closure Head circumferential and meridional welds.

2.1.1.3 Testing in Lieu of ASME Section XI Requirements

For future examinations of RPV circumferential, longitudinal, and meridional welds, the examinations will be performed to the extent possible as described in the previous paragraphs.

2.1.2 Straight Beam Examination of Reactor Pressure Vessel and Closure Head Welds Including Nozzle-to-Vessel Welds

2.1.2.1 Requirement From Which Relief is Requested

Subparagraph T-441.4.3 of Article 4 for the 1980 Edition of ASME Section V requires that prior to the angle beam examination, the base material through which the angle beam will travel shall be scanned with a straight beam transducer to detect laminar reflectors which might affect the angle beam results.

2.1.2.2 Justification

During the preservice examination at Hatch 1, the adjacent base material for the RPV and Closure Head welds, including the Nozzle-to-Vessel welds, were examined with a straight beam transducer and any laminar reflectors which would interfere with the angle beam scans were recorded. Since the size of these reflectors will not change, it is unnecessary to perform the straight beam scans again. Also, these scans would only result in additional radiation exposure without a corresponding benefit in reliability.

2.1.2.3 Testing in Lieu of ASME Section XI Requirements

Other examinations designed to detect service-induced flaws are required by ASME Section XI on these welds.

2.1.3 Volumetric Examination of Reactor Pressure Vessel and Closure Head Nozzle-to-Vessel Welds and Nozzle Inside Radius Sections

2.1.3.1 Requirement From Which Relief is Requested

Item Nos. B3.90 and B3.100 of Table IWB-2500-1 for the 1980 Edition of ASME Section XI require the volumetric examination of RPV and Closure Head Nozzle-to-Vessel welds and Nozzle Inside Radius Sections. The applicable examination volumes are shown in Figures IWB-2500-7(a) through (d). At Hatch, these examinations will be performed using ultrasonic techniques.

2.1.3.2 Justification

At Hatch, physical limitations prevent the ultrasonic sound beam from passing through the entire examination volume as shown by Figure IWB-2500-7(a) through (d). At a minimum, eight-five percent (85%) of the examination volume has ultrasonic sound beams passing through it. Showing the Nozzle-to-Vessel weld as N to V and the Nozzle Inside Radius Section as IRS, the following Hatch 1 nozzles cannot receive a full-Code examination:

Nozzle Identification	Limited Examinations
N2A (Recirc. Inlet)	N to V
N2B (Recirc. Inlet)	N to V
N2C (Recirc. Inlet)	N to V
N2D (Recirc. Inlet)	N to V
N2E (Recirc. Inlet)	N to V
N2F (Recirc. Inlet)	N to V
N2G (Recirc. Inlet)	N to V
N2H (Recirc. Inlet)	N to V
N2J (Recirc. Inlet)	N to V
N2K (Recirc. Inlet)	N to V
N4B (Feedwater)	N to V; IRS
N4D (Feedwater)	N to V; IRS

The nozzles listed above are the only ones with known limitations. Any other welds where limitations are encountered will have such limitations reviewed and documented.

2.1.3.3 Testing in Lieu of ASME Section XI Requirements

Not applicable to this relief request.

2.1.4 Volumetric Examination of Austenitic and Dissimilar Metal Piping Welds

2.1.4.1 Requirement From Which Relief is Requested

Item Nos. B5.10, B5.50, B9.11, and B9.12 of Table IWB-2500-1 for the 1980 Edition of ASME Section XI require a volumetric and surface examination of austenitic and dissimilar metal piping welds. In addition, Item No. B14.10 of Table IWB-2500-1 requires either a volumetric or a surface examination of the pressure retaining welds in Control Rod Drive (CRD) housings. These volumetric examinations are to be performed using ultrasonic techniques in accordance with Paragraph IWA-2232 of Section XI. This paragraph specifies that austenitic and dissimilar metal piping welds are to be examined in accordance with Article 5 of ASME Section V.

2.1.4.2 Justification

Article 5 of ASME Section V does not provide the detailed guidance necessary to examine austenitic and dissimilar metal piping welds with the exception of austenitic piping welds which have been repaired by weld overlay. These clad overlaid piping welds will be examined in accordance with Article 5 of ASME Section V and Appendix III of ASME Section XI.

2.1.4.3 Testing in Lieu of ASME Section XI Requirements

Since ferritic piping welds will be examined per Appendix III of ASME Section XI and to provide consistency, austenitic and dissimilar metal piping welds will also be examined in accordance with Appendix III.

2.1.6 Reactor Pressure Vessel Nozzle to Safe-End Welds (Nominal Pipe Size <4 Inches)

2.1.6.1 Requirement From Which Relief is Requested

Item No. B5.11 of Table IWB-2500-1 for the 1980 Edition of ASME Section XI requires a surface examination of the RPV nozzle-to-safe-end welds with nominal pipe size <4 inches. Relief from this requirement is requested.

2.1.6.2 Justification

The nozzle-to-safe-end welds for the instrumentation nozzles listed below are physically inaccessible for surface examination. The affected Hatch 1 nozzles are:

N10
N11A
N11B
N12A
N12B
N16A
N16B

In addition, the 2-inch RPV bottom head drain nozzle-to-safe-end weld cannot be examined due to inaccessibility. This drain line is surrounded by instrumentation lines and CRD housings which prevent the examiner from performing this examination.

2.1.6.3 Testing in Lieu of ASME Section XI Requirements

The nozzle-to-safe-end welds listed above will receive a remote visual examination with the exception of the 2-inch drain nozzle weld. In addition, these nozzles will be pressure tested per IWB-5000 of ASME Section XI since they are located within the hydrostatic test boundary of the Nuclear Steam Supply System.

2.1.7 Volumetric and Surface Examinations of Pressure Retaining Welds in Piping with Nominal Pipe Size ≥ 4 Inches

2.1.7.1 Requirement From Which Relief is Requested

Item No. B9.11 of Table IWB-2500-1 for the 1980 Edition of ASME Section XI requires the examination of pressure retaining welds in piping that are located within flued head containment penetration assemblies. These welds and their penetration assembly number for Hatch 1 are listed below.

Weld Identification No.	Penetration No.
1B21-1FW-18A-7A	X-9A
1B21-1FW-18B-6A	X-9B
1E51-1RCIC-4-D-20A	X-10
1E41-1HPCI-10-D-15A	X-11
1E11-1RHR-20B-D-13A	X-12
1E11-1RHR-24A-R-3A	X-13A
1E11-1RHR-24B-R-3B	X-13B
1G31-1RWCU-6-D-15B	X-14
1G31-1RWCU-6-D-15C	X-14
1E21-1CS-10A-3A	X-16A
1E21-1CS-10B-4A	X-16B
1E11-1RHR-4-HS-6A	X-17

2.1.7.2 Justification

These welds are inaccessible for examination due to the design of the flued head. All twelve circumferential butt welds, except the two located in the Reactor Water Cleanup (RWCU) penetration, are carbon steel.

The two stainless steel welds that are located in the RWCU penetration were made to replace a Type 304 SS pipe that had undergone IGSCC. The welds involved are a flued head with a Type 308L corrosion resistant clad on the inside surface to a Type 304L solution annealed pipe (< .035% carbon), and a Type 304L pipe-to-pipe weld. These welds were made in accordance with the guidelines of NUREG-0313 to minimize susceptibility to IGSCC.

2.1.7.3 Testing in Lieu of ASME Section XI Requirements

A UT baseline was performed on the two new welds in the RWCU system while they were accessible during repair to ensure a high quality weld.

In accordance with IWB-5221 of ASME Section XI, a system leakage test is to be performed on all 12 welds prior to startup following each reactor refueling outage.

All pipe-to-penetration (flued head) welds outside containment will be examined volumetrically. In addition, a surface examination will be performed on the accessible weld(s) of the flued head penetration assembly.

2.1.8 ASME Class 1 (Equivalent) Valves Exceeding 4-Inches Nominal Pipe Size and ASME Class 1 (Equivalent) Pump Casings

2.1.8.1 Requirement From Which Relief is Requested

Table IWB-2500-1, Item No. B12.40 for the 1980 Edition of ASME Section XI requires a visual examination of the internal pressure boundary surfaces of one valve in each group of valves that are of the same constructional design, such as globe, gate, or check valve, and manufacturing method and that are performing similar functions in the system.

Table IWB-2500-1, Item No. B12.20 of ASME Section XI requires a visual examination of the internal pressure boundary surface of one of the two Reactor Recirculation system pumps.

2.1.8.2 Justification

Disassembly of these valves and pumps for the visual examination during the inspection interval, in the absence of other required maintenance, represents an unnecessary exposure to radiation and contamination. Valves on the Reactor Recirculation (RC) system and the Residual Heat Removal (RHR) system suction lines would require off-loading the fuel elements and draining the RPV prior to disassembly. Work on the RC system pump discharge valves and the RHR system injection valves would require the installation of plugs in the jet pump risers. Preparatory work of this scope is considered impractical for the sole purpose of conducting a visual examination. Contamination levels in the valves and pumps associated with the RC system loops are particularly high due to the physical location at the bottom of the system. During routine maintenance, the valve body and the pump casing internal surfaces are visually examined. Many of the valves, particularly the containment isolation valves are disassembled for maintenance of leak-tightness. Disassembly of other Class 1 valves and the pumps solely for internal examination is counter to the "ALARA" guidelines to keep the occupational dose rates as low as reasonably achievable. In view of the cost in man-rem and in view of the minimal benefits obtained, we conclude that this Code requirement does not provide sufficient benefits to justify the exposure.

2.1.8.3 Testing in Lieu of ASME Section XI Requirements

Class 1 pumps and Class 1 valves exceeding four inches nominal pipe size are subject to visual examination of the internal surfaces when disassembled for maintenance. The coverage provided by examinations during routine maintenance coupled with periodic leak tests and hydrostatic tests will provide adequate assurance of the structural integrity of the Class 1 pumps and valves, while keeping exposure to radiation and contamination as low as reasonably achievable.

2.1.9 Pressure Retaining Welds in Control Rod Drive Housings

2.1.9.1 Requirement From Which Relief is Requested

Table IWB-2500-1, Item No. B14.10 for the 1980 Edition of ASME Section XI requires a volumetric or surface examination of the pressure retaining welds in 10% of the peripheral Control Rod Drive housings. Each housing has a pipe-to-pipe weld located near the RPV and a pipe-to-flange weld.

2.1.9.2 Justification

The examination of the pipe-to-pipe welds is not possible due to inaccessibility. The RPV support skirt surrounds the CRDs and prohibits any examination. (See relief request 2.1.1).

The examination of the pipe-to-flange welds is limited because of the location and design of the housings. Physical accessibility by an examiner is extremely limited by the close proximity of the housings to each other and by the support arrangement. Also, the insert and withdraw lines to the Control Rod Drive system are connected at the top of the housing flange and limit access to much of the lower weld. The combination of these factors limit the examination of these welds.

2.1.9.3 Testing in Lieu of ASME Section XI Requirements

These welds will be pressure tested per IWB-5000 of ASME Section XI since they are located within the hydrostatic test boundary of the Nuclear Steam Supply system.

3.1.1 Volumetric Examination of Pressure Retaining Welds in Class 2 Vessels

3.1.1.1 Requirement From Which Relief is Requested

Item Nos. C1.10, C1.20, and C1.30 of Table IWC-2500-1 for the 1980 Edition of ASME Section XI require the volumetric examination of Class 2 vessel shell circumferential, head circumferential, and tubesheet-to-shell circumferential welds, respectively. The volumetric examination of the Residual Heat Removal (RHR) system heat exchanger circumferential welds will be performed using ultrasonic techniques. The required examination volumes are shown in ASME Section XI Figures IWC-2500-1 and -2. Relief from this requirement is requested.

3.1.1.2 Justification

The shell and head circumferential weld examinations are limited by vessel supports adjacent to these welds. In addition, the ultrasonic examination of the head circumferential weld from the head side cannot be performed due to configuration. The examination volume as required by Figure IWC-2500-2 for the tubesheet-to-shell weld cannot fully be met due to configuration also.

3.1.1.3 Testing in Lieu of ASME Section XI Requirements

The ultrasonic examination of the shell and head circumferential welds will be supplemented by a surface examination. The tubesheet to shell weld cannot be properly prepared for surface examination nor can the examination be performed due to the tubesheet studs and nuts adjacent to the weld. In addition to the examinations described above, system pressure tests per Article IWC-5000 of ASME Section XI will be performed on these welds.

3.1.2 Surface Examination of Welded Attachments on RHR, Core Spray, HPCI, and RCIC Suction Lines from Torus

3.1.2.1 Requirement From Which Relief is Requested

Item No. C3.40 of Table IWC-2500-1 for the 1980 Edition of ASME Section XI requires 100% surface examination of integrally welded attachments on piping. Figure IWC-2500-5 determines the surface area of this examination.

Suction lines for RHR, Core Spray, HPCI, and RCIC systems penetrating the torus are seal welded to the outside surface of the torus wall. Relief is requested from the surface examination of these welded attachments.

3.1.2.2 Justification

At both Hatch units, these integrally welded attachments on lines penetrating the torus are obstructed by reinforcement plates added after plant construction. One hundred percent (100%) of the seal weld is inaccessible for a meaningful surface examination.

3.1.2.3 Testing in Lieu of ASME Section XI Requirements

Visual examination (VT-1) in accordance with IWA-2211 will be performed to insure the integrity of these attachments.

3.1.3 Surface Examination of Pressure Retaining Welds in Class 2 Pumps

3.1.3.1 Requirement From Which Relief is Requested

Item No. C6.10 of Table IWC-2500-1 for the 1980 Edition of ASME Section XI requires a surface examination of the pump casing welds from one Class 2 pump in each group of pumps that are of similar design, size, function, and service in a system. Relief from this requirement is requested.

3.1.3.2 Justification

Disassembly of these pumps for the surface examination during the inspection interval, in the absence of other required maintenance, represents an unnecessary exposure to radiation and contamination. During routine maintenance, the pump casing welds receive a surface examination. In view of the cost in man-rem and in view of the minimal benefits obtained, we conclude that this Code requirement does not provide a corresponding benefit in reliability.

3.1.3.3 Testing in Lieu of ASME Section XI Requirements

Class 2 pump casing welds are subject to surface examination when disassembled for maintenance. The coverage provided by examinations during routine maintenance coupled with hydrostatic tests will provide adequate assurance of the structural integrity of these pumps, while keeping exposure to radiation and contamination as low as reasonably achievable.

4.1.1 System Pressure Tests on Class 3 Small Diameter Piping

4.1.1.1 Requirement From Which Relief is Requested

Table IWD-2500-1 for the 1980 Edition of ASME Section XI requires a system pressure test for Class 3 lines regardless of size.

4.1.1.2 Justification

The system pressure test requirements for Class 3 will not be performed on lines two inches and smaller unless:

a. They are connected to larger lines which will be pressure tested.

b. Isolation valves are not provided so that these smaller lines may be isolated in case of leakage.

These smaller lines have wall thicknesses in excess of what ASME Section III requires for retaining internal pressure. Using heavier walled piping in these small lines essentially means they are over-designed for the pressure they are retaining and are not susceptible to the type leakages found during hydrostatic testing.

4.1.1.3 Testing in Lieu of ASME Section XI Requirements

Accessible piping two inches and smaller will be visually examined under normal operating pressure.

4.1.2 System Pressure Tests on Class 3 Buried Piping

4.1.2.1 Requirement From Which Relief is Requested

Table IWD-2500-1 of the 1980 Edition of ASME Section XI requires a system pressure test for Class 3 components including buried piping.

4.1.2.2 Justification

The service water systems were designed without including provisions for testing buried piping as required by Paragraph IWA-5244. In addition, the visual examination for leakage at the ground level is not feasible since a majority of the piping is buried under asphalt.

4.1.2.3 Testing in Lieu of ASME Section XI Requirements

Normal system functional testing demonstrates leaktight integrity of all buried piping.

4.1.3 Pressure Test on Plant Service Water System

4.1.3.1 Requirement From Which Relief is Requested

IWD-5223 of the 1980 Edition of ASME Section XI requires that the Plant Service Water System be tested at a pressure of 1.10 times the design pressure. Relief is requested from testing those portions where it is necessary to use a butterfly valve ten inches in diameter or greater as a hydrostatic test boundary valve.

4.1.3.2 Justification

Butterfly valves are basically flow control valves and are not intended to be block valves. The normal leakage through these large valves makes it impractical to attain and maintain the hydrostatic test pressure.

4.1.3.3 Testing in Lieu of ASME Section XI Requirements

A hydrostatic test will be performed on those portions of the Plant Service Water System which have a butterfly valve ten inches in diameter or greater at the normal operating pressure.

5.1.1 Requirement to Verify Hot or Cold Settings on Spring Cans and Snubbers

5.1.1.1 Requirement From Which Relief is Requested

Subparagraph IWF-3410(a)(5) of the 1980 Edition of ASME Section XI states that a component support condition which is unacceptable for continued service is improper hot or cold positions for spring supports or snubbers. Relief from this requirement is requested.

5.1.1.2 Justification

There are no exact design positions on the scales for spring supports or snubbers but an operational range where the indicator should be located.

5.1.1.3 Testing in Lieu of ASME Section XI Requirements

The visual examination will verify that the indicator falls within the operational limits.

5.1.3 Visual Examination of ASME Class 1, 2, and 3 Component Supports

5.1.3.1 Requirement From Which Relief is Requested

IWF-2410 of the 1980 Edition of ASME Section XI requires that visual examinations of component supports be completed in accordance with the applicable section of IWB, IWC, or IWD; however, IWB does not specify a minimum line size for which component supports may be exempted. Relief is requested from examining supports on ASME Class 1 lines, 2-inch nominal pipe diameter and less, during the completion of the Hatch Unit No. 1 first 10-year interval. Also, supports on ASME Class 2 and 3 lines 4-inch nominal pipe diameter and less will not be examined.

5.1.3.2 Justification

The hanger surveillance program for the first 10-year interval was originally based on the 1974 Edition of ASME Section XI with Addenda through Summer 1975. In this edition of the Code, IWB-1220(b)(1) allowed the exemption of all components where under the postulated condition of loss of coolant from the component during normal reactor operation, the reactor can be shut down using only a normal makeup system. For Plant Hatch, 2-inch nominal pipe diameter lines and smaller with associated supports may be exempted using IWB-1220(b)(1). Also, IWC-1220(d) and IWD-2600(c) allowed the exemption of supports on lines 4-inch nominal pipe diameter and less.

Since all supporting documentation, examination plans, and procedures incorporate this exemption, the scope of examinations to complete the first 10-year interval will continue to be determined from the 1974 Edition of the Code. Examination techniques will be determined from the 1980 Edition of ASME Section XI with Addenda through Winter 1980.

5.1.3.3 Testing in Lieu of ASME Section XI Requirements

All supports on ASME Class 1 lines greater than 2-inch nominal pipe diameter will be visually examined. All supports on ASME Class 2 and 3 lines greater than 4-inch nominal pipe diameter will be visually examined.

8.1.1 Basic Calibration Blocks for Pipe Weld Examinations

8.1.1.1 Requirement From Which Relief is Requested

Appendix III of the 1980 Edition of ASME Section XI delineates the requirements for the design and fabrication of basic calibration blocks for pipe weld examinations. It specifies that the basic calibration block shall be fabricated with notches and that the basic calibration block nominal diameter and thickness be equivalent to the component to be examined. Relief is requested so that existing basic calibration blocks may be used for pipe weld examinations.

8.1.1.2 Justification

The majority of existing Hatch basic calibration blocks used for pipe weld examinations were fabricated with diameters, thicknesses, and side-drilled holes in accordance with the 1974 Edition of ASME Section V. For the two primary reasons listed below, these same basic calibration blocks will be used to provide the most meaningful and thorough examinations possible:

1. Side-drilled holes as calibration reflectors result in a more sensitive ultrasonic examination than one using notches.

2. Correlation of ultrasonic data with previous examinations as required by Subarticle IWA-1400 of ASME Section XI makes it necessary that these basic calibration blocks be used so future examination results can be correlated with past results.

8.1.1.3 Testing in Lieu of ASME Section XI Requirements

The basic calibration blocks using side-drilled holes as calibration reflectors will be used for the majority of the pipe weld examinations.

8.1.3 Incorporation of Changes in Design, Testing, and Procedures without any Unreviewed Safety Questions into The Inservice Inspection Program/Plan

8.1.3.1 Requirement From Which Relief is Requested

10 CFR Part 50.59 allows changes to a nuclear facility and procedural changes in accordance with Plant Technical Specifications and the safety analysis report, without prior approval from the NRC, provided there are no unreviewed safety questions. The facility's Inservice Inspection Program/Plan should be revised to include these changes.

Changes such as valve operator, stroke time, pump performance, welds, etc., made in compliance with 10 CFR 50.59, which affects the ASME Section XI requirements may not be shown on the existing revision of the ISI program plan document. A relief is requested from this inconsistency.

8.1.3.2 Justification

Records of these changes will be maintained and any changes in ASME Section XI requirements pertaining to these changes will be complied with. However, a revision to the ISI Program Plan(s) for every minor change is unrealistic, costly and time consuming task. Any delay in revising the ISI program plan(s) will not endanger public health and safety.

8.1.3.3 Testing in Lieu of ASME Section XI Requirements

Records of all changes will be maintained. Changes affecting ASME Section XI requirements shall be incorporated into the ISI Program Plan(s), whenever a need for their update is warranted.

8.1.5 Due Date for Owner's Data Report for Inservice Inspection, Form NIS-1

8.1.5.1 Requirement From Which Relief is Requested

Paragraph IWA-6230 of the 1980 Edition of ASME Section XI requires that the Owner's Data Report for Inservice Inspection, Form NIS-1, shall be filed with the enforcement and regulatory authorities (in this case, the Nuclear Regulatory Commission) within 90 days of the completion of the inservice inspection. Relief from the ISI completion date relative to the reporting requirement and the due date are requested.

8.1.5.2 Justification

The 90-day due date from the completion of the inservice inspection is unrealistic to prepare the NIS-1 Form and to have the multiple reviews required. The preparation of the NIS-1 Form itself requires almost 90 days with at least another 30 days needed for the review by site personnel and the Inspector.

8.1.5.3 Reporting in Lieu of ASME Section XI Requirements

Form NIS-1 will be submitted to the NRC within 120 days after completion of the outage in which the examinations were performed.