



GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

December 12, 1996
6730-96-2341

U. S. Nuclear Regulatory Commission
Attn.: Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Inservice Inspection Program
Relief Request R11, Revision 1

By letter dated October 25, 1994, the USNRC approved the Inservice Inspection Program for the third ten year interval at the Oyster Creek Nuclear Generating Station (TAC No. M83210).

By letter dated May 7, 1993, GPU Nuclear submitted ASME Relief Request R11. This request proposed, in part, that welds examined pursuant to ASME Section XI category B-F/B5.10, B-J/B9.10, and C-F-1/C5.10, be inspected in accordance with NRC Generic Letter 88-01. Further, the request proposed that the inspectors would be qualified in accordance with Generic Letter 88-01. This request was approved by the NRC on October 25, 1994.

Pursuant to 10 CFR 50.55(a)(3), this letter is being written to request a revision to Relief Request R11 to allow for the utilization of newer, state of the art, detection methods. The requested alternate examinations would involve implementing the Performance Demonstration Initiative program. To allow for the timely submittal of requisite NIS-1 and NIS-2 forms from the recent Oyster Creek Nuclear Generating Station refueling outage, it is further requested that this alternate testing be granted by January 15, 1997.

9612180160 961212
PDR ADOCK 05000219
G PDR

A047
11

If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.

Very truly yours,

A handwritten signature in cursive script, reading "Michael B. Roche".

Michael B. Roche
Vice President and Director
Oyster Creek

MBR/JJR

Attachment

cc: Oyster Creek NRC Project Manager
Administrator, Region I
Senior Resident Inspector

Attachment 1
Relief Request R11, Revision 1
Performance Demonstration Initiative.

CODE REFERENCE:

ASME Section XI 1986 edition, without addenda:

1. Pressure retaining dissimilar metal welds, Category B-F/B5.10.
2. Pressure retaining welds in Class 1 piping systems, Category B-J/B9.10.
3. Pressure retaining welds in Class 2 piping systems, Category C-F-1/C5.10.

CODE REQUIREMENTS:

1. Category B-F/B5.10 examinations are required of each dissimilar metal weld in systems that see reactor coolant.
2. Category B-J/B9.10 examinations are required for piping of nominal pipe size four inches and larger and are subjected to a surface and volumetric examination. The total number of circumferential butt welds selected for examination shall equal 25% of the circumferential butt welds in the class 1 piping systems in accordance with Table IWB-2500-1, Examination Category B-J.
3. Category C-F-1/C5.10 examinations are required for 7.5% of the total number of welds, but not less than 28 welds, of all austenitic stainless steel high alloy welds not exempted by IWC-1200. The examinations shall be distributed in accordance with Table IWC-2500-1.

CODE RELIEF REQUEST:

The following requests are based on the dual inspection requirements for ASME Section XI and Generic Letter 88-01. The three ASME Section XI examination categories described above are inclusive with the examination criteria for IGSCC detection in accordance with the Generic Letter. The subject welds are piping of austenitic stainless steel, 4 inches or larger in nominal diameter, and contain reactor coolant at a temperature greater than or equal to 200 °F during power operation. GPUN requests the following relief:

1. Apply credit to ASME Section XI ultrasonic examination requirements when an IGSCC ultrasonic examination that meets Generic Letter 88-01 requirements is performed on a weld. (This has already been approved as Relief Request R11.)
2. Apply credit to ASME Section XI ultrasonic examination requirements when ultrasonic examination techniques and personnel qualified to Performance Demonstration Initiative (PDI) criteria for the detection of IGSCC are utilized.

BASIS FOR RELIEF:**Relief Request No. 1**

There are more than 300 welds identified as having both ISI and IGSCC inspection requirements. For ISI, these welds are examined to categories B-F/B5.10, B-J/B9.10 and C-F-1/C5.10 requirements. For IGSCC these welds are examined to Generic Letter 88-01 requirements. Efforts have been made to consolidate the two inspection schedules for ASME XI and IGSCC scopes, but the differences between the two scheduling criteria often result in a duplication of inspections. The limitations imposed by IGSCC requirements were due to the extreme inspection frequency criteria for the IGSCC examinations. The schedule can range from a 25% inspection sample within the Ten Year Inspection Interval to as many as five inspections for the same weld within the Ten Year Inspection Interval. The scope criteria for ASME Section XI are, B-F (100%) , B-J (25%) and C-F-1 (7.5%). The limitations caused by ASME Section XI were due to the maximum examination credit per period and sequence of examinations from interval to interval per IWB-2400 and IWC-2400. In complying with both the ISI schedule and IGSCC schedule, GPUN has experienced scheduling hardships that have resulted in unwarranted radiation exposures, and both unnecessary labor and material costs.

Relief Request no. 2

By letter dated March 1, 1996, Russell to Donovan, the USNRC approved Intergranular Stress Corrosion Cracking (IGSCC) examiner qualifications obtained by passing the PDI qualification program. Further, in that same letter the USNRC states in part:

“... it is intended that the PDI program eventually replace the IGSCC Coordination Plan and that the IGSCC Coordination Plan will subsequently be dissolved...”

In the recent refueling outage, 16R, the IGSCC examinations were performed by ultrasonic procedures and contractor personnel that were qualified under the PDI Program. Section XI credit was intended to be taken for some of the IGSCC examinations based on Relief Request R11, which was granted by NRC letter dated October 25, 1994. It was subsequently determined that a revision to Relief Request R11 would be necessary in order to take Section XI credit for the examinations that were completed this refueling outage. The NIS-1 and NIS-2 forms are due for submittal to the USNRC by January 23, 1997.