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SUBJECT: Requests one-time relief from 10CFR50, App J post-mod
 containments leak rate testing requirements.

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February 26, 1991

10 CFR Part 50
Appendix J

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

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

Request for One-Time Relief from 10 CFR Part 50, Appendix J,
Post-Modification Containment Leak Rate Testing Requirements

The purpose of this letter is to request NRC approval to delay performance of post-modification containment leak rate testing required by 10 CFR Part 50, Appendix J. Specifically, NSP is requesting approval to delay the testing required by Paragraph IV.A of 10 CFR Part 50, Appendix J, which requires that a Type A, B or C leak rate test be performed subsequent to modification of the primary reactor containment boundary.

During the upcoming 1991 refueling outage, NSP plans to install manual valves in the 16" High Pressure Coolant Injection (HPCI) and 8" Reactor Core Injection Cooling (RCIC) exhaust lines to the torus. The new valves are being installed between the torus and the four existing containment isolation check valves (HPCI-9, RCIC-9, HPCI-10, and RCIC-10) to facilitate Appendix J testing of the check valves. To be in full compliance with Appendix J, the check valves should undergo Type C pneumatic leak rate testing at 42 psig during each refueling outage, however, check valves HPCI-10 and RCIC-10 cannot be tested in the correct direction. Installing the manual valves will permit isolating the check valves from the torus, thereby enabling the plant to perform Appendix J testing of all four containment isolation valves in the correct direction.

In accordance with Paragraph IV.A of Appendix J, the four full penetration butt welds needed to install the 8" and 16" block valves must undergo a Type A, B, or C leak rate test. In order to perform local leak rate testing of the butt welds on the torus side of the new valves, it would be necessary to cut off the HPCI and RCIC spargers inside the torus and weld on test caps. Upon completion of the tests, the test caps would be cut off and the spargers welded back in place. An alternate but less desirable approach would be to perform a Type A primary containment integrated leak rate test.

The additional work necessary to perform a leak rate test that includes the two torus side butt welds is not considered warranted at this time. NSP is requesting NRC approval to defer Appendix J leak rate testing of the two welds until the 1993 refueling outage. Information supporting this request is as follows:

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February 26, 1991

Page 2

- No full penetration butt weld subject to Appendix J testing at Monticello has ever contributed to the overall leak rate of a containment penetration.
- Both of the butt welds will be subjected to visual examination, liquid penetrant inspection and volumetric radiographic examination.
- Both welds will be leak rate tested during performance of the Appendix J, Type A primary containment integrated leak rate test scheduled for the 1993 refueling outage. A Type A test was last performed at Monticello during the 1989 refueling outage.
- The manufacturer will perform a 425 psig hydrostatic test of the valve body, with 80 psig pneumatic tests of the packing, gaskets and seats. NSP will subject these same components to a 75 psig construction pneumatic test after installation, and will subsequently perform an Appendix J, Type C leak rate test which will include the new butt welds opposite the torus.
- The estimated cost of cutting off the spargers, installing test caps, and reinstalling the spargers is \$40,000. An additional concern is the potential impact on the refueling outage schedule. NSP does not have direct control over the delivery date of the new valves, and the delivery date has already slipped one month. The possibility exists that the delivery date may slip again to the third week in April, and if this occurred the startup would be delayed due to extending the time the torus is kept drained for the sparger work. Although the extent of the delay would depend on the actual delivery date of the valves, the estimated cost of extending the outage is approximately \$ 200,000.00 per day (including replacement power costs).
- The estimated cost of performing a special Type A primary containment integrated leak rate test during the 1991 refueling outage is \$ 950,000.00. This estimate includes the cost of performing the test as well as the cost of extending the outage critical path 4 days.

In summary, the additional effort required to perform an Appendix J test on the torus side butt welds at this time is not considered warranted. The historical absence of leakage from similar primary containment welds and the extensive nondestructive examination and pressure testing to be performed support the view that the pressure integrity of the two butt welds will be assured until the 1993 outage, when a primary containment integrated leak rate test will be performed. By obtaining NRC approval to defer this test, NSP will avoid the additional cost and potential schedule impact associated with conducting an Appendix J, Type A, B, or C leak rate test that includes the two torus side butt welds.

USNRC

February 26, 1991

Page 3

Northern States Power Company

The work in the torus associated with this modification is scheduled to begin April 10, 1991. NRC review and approval of this request is needed prior to April 1, 1991 to allow time for outage planning should the staff not concur with NSP's request.

Please contact us if you have any questions concerning this request.



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