

# ACCELERATED DOCUMENT DISTRIBUTION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9304260285 DOC. DATE: 93/04/19 NOTARIZED: NO DOCKET #  
 FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244  
 AUTH. NAME AUTHOR AFFILIATION  
 MECREDY, R.C. Rochester Gas & Electric Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Forwards Relief Request 24 from ASME Code, Section XI requirements for hydrostatic testing for replacement activities already in progress during present refueling outage, per NRC 900806 ltr re ISI program SER.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4  
 TITLE: OR Submittal: Inservice/Testing/Relief from ASME Code

NOTES: License Exp date in accordance with 10CFR2,2.109(9/19/72). 05000244 /

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD1-3 LA	1 0	PD1-3 PD	1 1
JOHNSON, A	2 2		
INTERNAL: NRR/DE/EMEB	1 1	NUDOCS-ABSTRACT	1 1
OC/LEMB	1 0	OGC/HDS1	1 0
REG FILE 01	1 1	RES MILLMAN, G	1 1
RES/DSIR/EIB	1 1		
EXTERNAL: EG&G BROWN, B	1 1	EG&G RANSOME, C	1 1
NRC PDR	1 1	NSIC	1 1

Grt NO p237846812

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 15 ENCL 12

MA-4



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER N.Y. 14649-0001



ROBERT C. MECREDY  
Vice President  
Ginna Nuclear Production

TELEPHONE  
AREA CODE 716 546-2700

April 19, 1993

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Attn: Allen R. Johnson  
Project Directorate I-3  
Washington, D.C. 20555

Subject: Quality Assurance Manual, Appendix B  
Ginna Nuclear Power Plant Inservice Inspection  
ASME Section XI Required Examinations  
R.E. Ginna Nuclear Power Plant  
Docket No. 50-244

Ref.(a): Letter from A.R. Johnson (NRC), to R.C. Mecredy (RGE),  
Subject: Quality Assurance Manual revision, Appendix B,  
dated January 12, 1993

(b): Letter from A.R. Johnson (NRC), to R.C. Mecredy (RGE),  
Subject: Third 10-year In Service Inspection Program  
Safety Evaluation Report dated August 6, 1990

Dear Mr. Johnson:

The purpose of this letter is to request relief from the provisions of the ASME Code, Section XI, requirements for hydrostatic testing for replacement activities at Ginna Nuclear Station. Because this activity is in progress during our present refueling shutdown, action on the attached Relief request No. 24 is requested by April 25, 1993. This request is for a "one-time" use for the activity described in the relief request.

Very truly yours,

Robert C. Mecredy

REJ\279  
Attachment

*Cert Do 237846812*  
*AOA7*  
*111*

260136

9304260285	930419
PDR: ADDCK	05000244
P	PDR

1008

1008

xc: Mr. Allen R. Johnson (Mail Stop 14D1)  
Project Directorate I-3  
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Ginna Senior Resident Inspector

## RELIEF REQUEST #24

### SCOPE

This request for relief is for a "one-time" use for the replacement of four Class 3 service water valves. The four valves being replaced are valve numbers 4663, 4013, 4027, and 4028. The replacement represents a previously unscheduled activity attributable to defects encountered during a refurbishment program. The replacement of the valves is being performed to the 1986 edition of ASME B&PV Code, Section III.

An evaluation to establish the work area test boundaries for the valve replacements was performed as discussed below (refer to drawings 33013-1250 sheet 3 for V-4663 and 33013-1237 for V-4013, V4027, V-4028):

All replacement valves are gate valves. Isolation boundaries for the valves would require the use of butterfly valves, making an elevated (hydrostatic) pressure test impractical. (see Relief Request #14 approved in Reference b).

### RELIEF REQUESTED

#### I. Component for which Relief is Requested:

Service Water System, Rules for Hydrostatic Testing of Repairs, Replacements or Modifications to pressure retaining Class 3 components.

##### 1. Installation of isolation valves

- a. V-4663
- b. V-4013
- c. V-4027
- d. V-4028

#### II. ASME Requirement from which Relief is Requested:

Hydrostatic Testing of Repairs, Replacements or Modifications on Class 2 or 3 systems is required by IWA-4400 which specifies that hydrostatic testing shall be performed to IWC-5222(a) and IWD-5223(a). The system hydrostatic test pressure shall be at least 1.10 times the system pressure  $P_{sv}$  for systems with Design Temperature of 200°F or less, and at least 1.25 times the system pressure  $P_{sv}$  for systems with Design Temperature above 200°F. The system pressure  $P_{sv}$  shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure  $P_d$  shall be substituted for  $P_{sv}$ .

### III. Proposed Alternate Method:

#### ALTERNATIVE PRESSURE TEST REQUIREMENT FOR WELDED REPAIRS OR INSTALLATION OF REPLACEMENT ITEMS BY WELDING

##### For Class 3

Using ANSI B31.1 and ASME B&PV Code Case N-416 as a basis for relief, Rochester Gas and Electric considers the following alternative requirements to be acceptable:

1. NDE shall be performed in accordance with the methods and acceptance criteria of Subsection ND of the 1986 Edition of Section III.
2. Prior to, or immediately upon return to service, a VT-2 visual examination shall be performed in conjunction with an inservice or functional leakage test, using the 1986 Edition of Section XI, in accordance with IWA-5000, at nominal operating pressure and temperature.
3. Use of this Relief request will be documented on the NIS-2 Form for the Replacement.