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 AUTH. NAME: AUTH. AFFILIATION
 MECREDY, R.C. Rochester Gas & Electric Corp.
 RECIP. NAME: RECIPIENT AFFILIATION
 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Forwards mod to 930405 Relief Request 23 from ASME Section
 XI requirements for hydrostatic testing of svc water sys &
 turbine-driven auxiliary feedwater sys, per NRC 900806 SER re
 third 10-yr inservice insp program.

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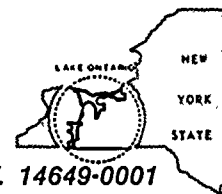
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ROBERT C. MECREDY
Vice President
Ginna Nuclear Production

April 20, 1993

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

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

Ref.(a): Letter from R. C. Mecredy (RGE), to A. R. Johnson (NRC),
to 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 Inspected Program
Safety Evaluation Report dated August 6, 1990

Dear Mr. Johnson:

The purpose of this letter is to modify Relief Request #23, dated 4/5/93, which requested relief from the provisions of the ASME Code, Section XI requirements for hydrostatic testing for two replacement activities at Ginna Station. Because these activities are in progress during our present refueling shutdown, action on the attached (revised) Relief Request No. 23, which is for a "one-time" use for these two activities, is requested by April 21, 1993.

Very truly yours,

Robert C. Mecredy
Robert C. Mecredy

REJ\272

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

U.S. Nuclear Regulatory Commission
Region I
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U.S. NRC Ginna Senior Resident Inspector

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RELIEF REQUEST #23

RELIEF REQUESTED

I. Component for Which Relief is Requested:

- A. 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-4611
- b. V-4613
- c. V-4626
- d. V-4669
- e. V-4738
- f. V-4739
- g. V-4760

- B. Turbine Driven Auxiliary Feedwater System, Rules for Hydrostatic Testing of Repairs, Replacements or Modifications to pressure retaining Class 3 components.

1. Installation of valve V-4023

II. ASME Requirement from which relief is requested:

Hydrostatic testing of Repairs, Replacements or Modifications on Class 3 systems is required by IWA-4400 which specifies that hydrostatic testing shall be performed to 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 for 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. BASIS

The first activity to be performed is the replacement of seven valves in the Class 3 Service Water System. The second activity is the replacement of a check valve in the Class 3 Turbine Driven Auxiliary Feedwater System.

Service Water System

Seven valves within the service water system are currently being replaced: valve numbers 4611, 4613, 4626, 4669, 4738, 4739, and 4760. 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 sheets 1-3):

V-4626: The replacement valve is a gate valve. Both the upstream and downstream isolations would require the use of butterfly type isolation valves, thus making an elevated (hydrostatic) pressure test impractical. (see Relief Request #14 approved in Reference b)

V-4611, V-4669, V-4738, V-4739, V-4760, V-4613:

The first five replacement valves are gate valves and serve as loop cross-connects. V-4613 is a butterfly type design and serves as a loop isolation valve. In order to isolate the selected areas for replacement, freeze seals would be required to maintain some systems supplied by the Service Water System operational. The use of freeze seals as isolation boundaries is not feasible. In order to establish test boundaries, complete service water loops would be required to be isolated, thus creating an operational hardship resulting in a reduction in plant safety due to rendering certain critical operational and safety related equipment unavailable.

Turbine Driven Auxiliary Feedwater System

The work activity being performed is the replacement of check valve 4023 in the recirculation test line. The Code used for this work is the 1989 edition of ANSI B31.1. Once the valve is installed, the pipe section cannot be isolated to perform the elevated (hydrostatic) pressure test.

Referring to drawing 33013-1237, boundaries for the work area would be the pump suction valves (V-4024 & 4098), the pump discharge valve (V-3996) and downstream flow control valve V-4291. Both V-3996 and V-4291 are not designed for isolation applications, and would require the installation of test blocks. Installation of these blocks was found to be impractical.

Part of the work area would incorporate piping having a design pressure of 150 psi, with a required test pressure of 2304 psi, therefore, an unacceptable condition would exist. Installation of a test block at the discharge of the pump was reviewed and found to be impractical because disassembly of the pump would be required.

IV. 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. Additional NDE also is performed by dye penetrant testing of the root pass weld for the service water valves. For V-4023 a surface examination will be performed.
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.

This code required test pressure and the nominal system pressure at which a leak test will be performed as proposed are shown in the table below:

SWS Valves	Code Req'd Test Press	Test Press to be Performed(1)
V-4611	165 psig	75 psig (Nom.)
V-4613	165 psig	75 psig (Nom.)
V-4626	165 psig	75 psig (Nom.)
V-4669	165 psig	75 psig (Nom.)
V-4738	165 psig	75 psig (Nom.)
V-4739	165 psig	75 psig (Nom.)
V-4760	165 psig	75 psig (Nom.)

(1) Test pressure reflects system operating pressure of nominal 75 psig

The test pressure (and nominal operating pressure) is considered adequate to detect potential leakage after performing the replacement.

AFW Valve	Code Req'd Test Press	Test Press to be Perform(2)
V-4023	2304 psig	1100 (Nom)

(2) Test pressure reflects system operating pressure of nominal 1100 psig.

3. Use of this Relief Request will be documented on the NIS-2 Form for the Replacement.

