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SUBJECT: Forwards Relief Request 26,requesting relief from provisions of ASME Code,Section XI requirements for hydrostatic testing for welded repair & replacement activities on component cooling water sys,for approval by 940204.

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December 9, 1993

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
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
Relief Request No. 26
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

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 welded repair and replacement activities on the Ginna component cooling water system. These activities are planned for the spring 1994 Refueling Outage. This relief request is made in accordance with the provisions of 10CFR50.55a(a)(3)(i). The basis for this relief request is consistent with the ASME Section XI safety philosophy espoused in pending Code Case N-416-1, which is currently in the approval process. This case has been reviewed by the NRC, and comments have been provided back to ASME. Our relief request No. 26 incorporates the NRC comments. We believe that the alternative examination and testing presented in this relief request provides the acceptable level of quality and safety required.

Because of the extensive Component Cooling Water System repair work currently scheduled for the 1994 Refueling Outage (beginning March 4), we request that this Relief Request be approved by February 4, 1994.

Very truly yours,


Robert C. Mecredy

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Attachment

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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 NO. 26

I. Components for Which Relief is Requested:

The Class 3 portions of the Component Cooling Water System (CCWS) when hydrostatic pressure tests are required due to repair or replacement activities.

II. ASME Requirements from Which Relief is Requested:

Relief is requested from the requirements specified in IWA-4400 and IWD-5223(a) of the 1986 Edition, no addenda.

Hydrostatic testing of repairs or replacements in Class 3 systems is required by IWA-4400.

The pressure testing rules of IWA-4400(a):

After repairs by welding on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000.

IWA-5000 specifies that hydrostatic testing shall be performed to IWD-5223(a).

IWD-5223(a) states in part the following:

The system hydrostatic pressure shall be at least 1.10 times the system pressure P_{SV} for systems with Design Temperature of 200°F or less, ...and

III. BASIS

Industry studies have shown that the hydrostatic pressure test specified in IWD-5223(a) is not an integrity test of the weld, but is in fact a leakage test run at a high pressure. Using surface examination methods on different passes of the weld or volumetric examinations methods on a completed weld provide more comprehensive results in the determination of the integrity of the weld. In addition, a system inservice or functional test and VT-2 examination will be performed on the completed welds.

The CCWS is a moderate energy system that operates at a nominal 90 psig, which is only 98 psig below the Code required hydrostatic test pressure. The Code required hydrostatic test would not offer any significant increase in the ability to determine the leak-tightness of the repairs over testing performed at system nominal operating pressure. The structural integrity will be ensured by the controls instituted in the repair or replacement procedures and verified with NDE. Since the system is in constant operation,



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its integrity is continually monitored. In addition, the redundancy in CCWS gives added assurance of meeting heat load requirements.

IV. Proposed Alternate Method:

In lieu of performing the hydrostatic pressure test required by IWA-4400 for welded repairs or installation of replacement items in the Component Cooling Water System (Class-3) by welding, the following requirements shall be performed.

1. NDE shall be performed in accordance with the methods and acceptance criteria of Subsection ND of the 1986 Edition of Section III. In addition, when the surface examination method is used in accordance with ND-5222 for a butt weld, an additional surface examination shall be performed on the root (pass) layer.
2. Prior to or immediately upon return to service, a VT-2 visual examination shall be performed in conjunction with a system inservice or functional 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 shall be documented on an NIS-2 Form.

