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

SUBJECT: Requests extension of encl Relief Request 25 through 1995
 refueling outage, based on NRC concurrence w/util methodology
 related to addl work required to be performed to replace
 two SWP discharge check valves 4603 & 4604 by 940929 telcon.

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ROBERT C. MECREDY

Vice President
Nuclear Operations

September 30, 1994

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

Subject: Extension of Relief Request No. 25
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

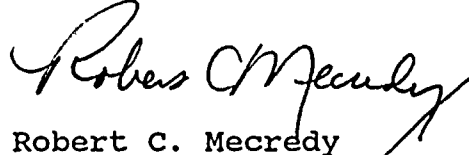
Ref.(a): Letter from W. R. Butler (NRC), to R. C. Mecredy (RG&E),
Subject: R. E. Ginna Nuclear Power Plant - Third 10-Year
Inservice Inspection Program Relief Requests 25 and 26,
dated April 11, 1994

Dear Mr. Johnson:

In the referenced letter, RG&E was granted relief from the provisions of ASME XI requirements for hydrostatic testing for welded repair and replacement activities associated with the service water system during the 1994 refueling outage (see Attached Relief Request #25). Additional work is now required to be performed to replace two service water pump discharge check valves 4603 and 4604. It is expected that 4603 replacement will commence about October 3, 1994. To support these activities RG&E requests a documented extension of Relief Request No. 25 through the 1995 refueling outage. This request is made in accordance with the provisions of 10CFR50.55a (a)(3)(i).

Based on NRC concurrence with RG&E's methodology as discussed by a teleconference between Al Johnson of the NRC and RG&E personnel on September 29, 1994, RG&E intends to proceed with this replacement activity prior to formal receipt of NRC documentation.

Very truly yours,


Robert C. Mecredy

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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. 25

I. Components for which Relief is Requested.

The Class 3 portions of the Service Water System (SWS), including SWS supply to Auxiliary Feedwater, 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.

- a. 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.

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

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

"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, ..." [or]..."For systems....not provided with safety or relief valves, the system design pressure P_d shall be substituted for P_{sv} ."

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 SWS is a moderate energy system which does not have safety or relief valves installed for purposes of overpressure protection. The system operates at a nominal 75 psig, which is only 90 psig below the Code required hydrostatic test pressure of $1.10 \times P_d$. The Code required hydrostatic test would not offer any significant increase in the ability to

RELIEF REQUEST NO. 25

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, its integrity is continually monitored. In addition, the redundancy in SWS 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 Service Water System (Class 3) by welding, the following examinations and tests 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 Case shall be documented on an NIS-2 Form.