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JOHNSON,A.R. Project Directorate I-3

SUBJECT: Responds to 930908 ltr,which discussed two issues involving ISI Program (1990-1999).

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ROBERT C. MECREDY
Vice President
Nuclear Operations

December 15, 1994

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

Subject: Ginna Nuclear Plant Inservice Program
Quality Assurance Manual, Appendix B
ASME Section XI Required Examination
Revision to Relief Request 13
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Ref.(a): Letter from W. R. Butler (NRC), to R. C. Mecredy (RG&E), "R.E. Ginna Nuclear Power Plant - Third 10-Year Interval Inservice Inspection Program Plan and Associated Requests for Relief (TAC NOS. M84044 and M86225), dated September 8, 1993.

Dear Mr. Johnson:

This letter is written in response to your Reference (a) letter in which you discussed two issues involving the Interval Inservice Inspection (ISI) Program (1990-1999). RG&E has reviewed your comments on the Third Interval ISI Program and the associated Relief Request 13 as follows:

1. Pressure testing of piping that penetrates the Reactor Containment, when the piping and isolation valves that are part of the containment system are Class 2 and the balance of the piping system is outside the scope of section XI.

   This issue was recently balloted, and approved for use, by the ASME Boiler and Pressure Vessel Code Committee, Section XI, as Code Case N-522. This Code Case was positively balloted by the NRC representative.

   RG&E desires to implement this Code Case into our Inservice Testing Program, and is thus submitting a revised relief request in accordance with the provisions of 10CFR50.55a(a)(3)(i). RG&E requests that this Relief Request be reviewed and approved prior to the Refueling Outage beginning in March 1996.

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2. Removal of insulation, during hydrostatic tests, from bolted connections used in piping systems (containing boric acid) for controlling reactivity.

After further review, RG&E has determined that the previous Relief Request should be withdrawn. RG&E will remove paragraph 1.10.3.2 from Section 1 of the Third Interval ISI Program. An approved revision of Section 1 will be forwarded to you as part of the annual review of the ISI program.

This submittal is intended to replace the original Relief Request 13 in its entirety. If you require any further information in regard to these issues please contact me.

Very truly yours,

Robert C. Mecredy

REJ/356

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. 13 (REV. 1)

I. Components for Which Relief is Requested:

Piping that penetrates the containment vessel, when the piping and isolation valves that are part of the containment system are Class 2 and the balance of the piping system is outside the scope of Section XI.

II. ASME Requirement from Which Relief is Requested:

Relief is requested from the requirements specified in IWA-1320(d), Table IWC-2500-1, Examination Category C-H of the 1986 Edition, no addenda.

Table IWC-2500-1, Category C-H, requires two inservice or functional tests (IWC-5221) and a hydrostatic test (IWC-5222) per inspection interval.

III. Basis

There are two types of piping systems that pass through the containment vessel, safety related and non-safety related. The piping (and valves) that penetrate the containment vessel are required to be Class 2 (IWA-1320(d)). For the non-safety related systems, only the containment penetration portion of the piping would be Class-2 and require a special pressure test. The only safety function of this piping is in support of the containment system when containment isolation is required, therefore, testing in accordance with Appendix J rules would be appropriate.

IV. Proposed Alternate Method:

Implement ASME, Boiler & Pressure Vessel Code Case N-522, "Pressure Testing of Containment Penetration Piping".