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SUBJECT: Requests relief from provision of ASME Code, Section XI requirements for interval hydrostatic testing of Class 3 components.

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ROBERT C. MECREDY
Vice President
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December 21, 1994

U.S. Nuclear Regulatory Commission
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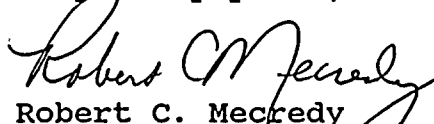
Subject: Ginna Nuclear Plant Inservice Program
Quality Assurance Manual, Appendix B
ASME Section XI Required Examination
Relief Request 28
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

The purpose of this letter is to request relief from the provision of the ASME Code, Section XI requirements for interval hydrostatic testing of Class 3 components. This relief request is made in accordance with the provisions of 10 CFR 50.55(a)(3)(i).

Regulatory Guide 1.147 approved Code Case N-498, "Alternative Rules for 10-year System Hydrostatic Pressure Testing for Class 1 and 2. The ASME Code Committee has recently passed a revision to N-498 incorporating these alternatives for Class 3 requirements. This revision, Case N-498-1, was ballotted positively by the NRC representative. RG&E requests that we be allowed to incorporate this revised Code Case into our ISI program. We believe that the alternative testing presented in the Code Case provides the acceptable level of quality to ensure that safety is maintained.

Very truly yours,


Robert C. Mecredy

REJ/357

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

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Ginna Senior Resident Inspector

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RELIEF REQUEST NO. 28

I. Components for Which Relief is Requested:

Class 3 piping systems within scope of Section XI, by Tables IWD-2500-1, Categories DA, DB and DC.

II. ASME Requirement from Which Relief is Requested:

Relief is requested from the requirements from the hydrostatic pressure test, IWD-5223, specified in Tables IWD-2500-1, Examination Categories DA, DB, and DC of the 1986 Edition, no addenda.

Table IWD-2500-1, Categories D-A, D-B, and DC requires two inservice (IWD-5221) or functional tests (IWD-5222) and a hydrostatic test (IWD-5223) per inspection interval.

III. Basis

Currently Code Case N-498 is approved for use by Regulatory Guide 1.147. Case N-498 only covered Class 1 and Class 2 systems. Recently the ASME Code Committees have approved a revision to Case N-498 (now N-498-1), which incorporates these requirements for Class 3 systems. The alternate requirements for Class 3 systems provide an adequate level of safety and can be met under the current established pressure testing program.

IV. Proposed Alternate Method:

Implement ASME, Boiler & Pressure Vessel Code Case N-498-1, "Alternative Rules for 10-year System Hydrostatic Pressure Testing for Class 1, 2, and 3 Systems"

