

PRIORITY

(ACCELERATED RIDS PROCESSING)

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NR: 9510180022 DOC. DATE: 95/10/11 NOTARIZED: NO DOCKET #
FACIL: 50-244 Robert Emmet Ginna Nuclear Plant, Unit 1, Rochester G 05000244
AUTH. NAME AUTHOR AFFILIATION
MECREDY, R.C. Rochester Gas & Electric Corp.
RECIP. NAME RECIPIENT AFFILIATION
JOHNSON, A.R.

SUBJECT: Requests relief from provisions of ASME Code, Section XI requirements for hydrostatic testing for welded repair & replacement activities for Class 1, 2 & 3 systems.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
TITLE: OR Submittal: Inservice/Testing/Relief from ASME Code - GL-89-04

NOTES: License Exp date in accordance with 10CFR2, 2.109(9/19/72). 05000244

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD1-1 LA	1 1	PD1-1 PD	1 1
	JOHNSON, A	1 1		
INTERNAL:	AEOD/SPD/RAB	1 1	FILE CENTER 01	1 1
	NRR/DE/ECGB	1 1	NRR/DE/EMCB	1 1
	NRR/DE/EMEB	1 1	NUDOCS-ABSTRACT	1 1
	OGC/HDS3	1 0	RES/DSIR/EIB	1 1
EXTERNAL:	LITCO ANDERSON	1 1	NOAC	1 1
	NRC PDR	1 1		

Cont # P8331560 97

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL
DESK, ROOM OWFN 5D8 (415-2083) TO ELIMINATE YOUR NAME FROM
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 14 ENCL 13

may



ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649-0001



AREA CODE 716 546-2700

ROBERT C. MECREDY
Vice President
Nuclear Operations

October 11, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-1
Washington, D.C. 20555

Subject: Ginna Station Inservice Inspection Program
ASME Section XI Required Examinations
Relief Request No. 31
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 for Class 1, 2, and 3 systems. This relief request is made in accordance with the provisions of 10CFR50.55(a)(3)(i). The basis of this relief request is the recently issued ASME Section XI Code Case N-416-1. The alternative examination and testing requirements presented in this relief request are in accordance with the Code Case to provide an acceptable level of quality and safety. This request is being made in support of the steam generator replacement activity scheduled for the upcoming spring 1996 refueling outage. As such, we request your action on this item by December 5, 1995. Any questions regarding the scope or timing of this relief request should be directed to George Wrobel of my staff at (716)724-8070.

Very truly yours,


Robert C. Mecredy

REJ\395

xc: Mr. Allen R. Johnson (Mail Stop 14B2)
Project Directorate I-1
Washington, D.C. 20555

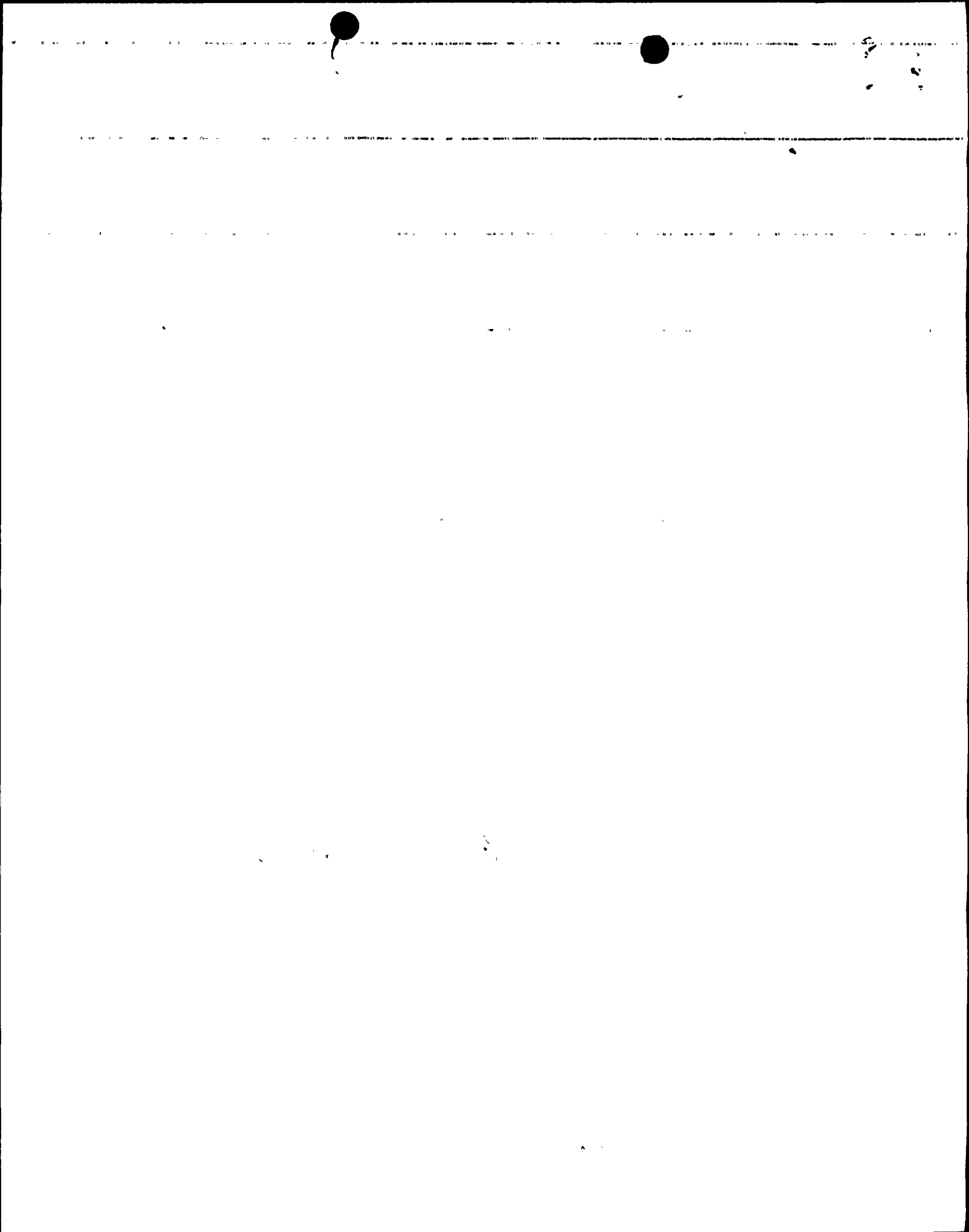
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector

9510180022 951011
PDR ADOCK 05000244
PDR

cert# PB33156097

ADH71



RELIEF REQUEST NO. 31

CODE CASE N-416-1

I. Components for Which Relief is Requested:

All Class 1, 2, and 3 systems.

II. ASME Requirements for Which Relief is Requested:

Article IWA-4000 and IWA-5000 hydrostatic pressure test requirements.

III. Basis - Code Case N-416-1:

The above Articles require that hydrostatic pressure testing be performed after welded repair or installation of replacement items by welding on ASME Class 1, 2, and 3 pressure boundary components. The higher pressures imposed on the pressure boundary components during hydrostatic testing do not challenge the structural integrity of the material, and produce only a slight enhancement in leak detection capability. The additional leakage, above that which occurs during a system pressure test at nominal operating pressure, is inconsequential in determining pressure boundary integrity. The Code Case N-416-1 provides an acceptable alternative to these requirements.

In addition, the added burden of requiring special maintenance activities for isolation of components to be tested, such as; temporary gagging or removal of relief valves installed to prevent overpressurization, leaktight repair of valving which does not normally serve a pressure isolation function, pinning of applicable supports and installation of portable hydrostatic pressure pumps can be avoided.

Adoption of this Code Case will provide for substitution of additional NDE and a system leakage test, conducted at nominal operating pressure, for the post-repair/replacement hydrostatic test, currently required for Class 1, 2, and 3 systems.

IV. Proposed Alternate Method:

The requirements of Code Case N-416-1 will be implemented as alternate provisions to the ASME Section XI Code, 1986 Edition with, no Addenda, for Class 1, 2, and 3 pressure boundary component welded repairs and installation of replacement items as follows:

- (a) NDE shall be performed in accordance with methods and acceptance criteria of the applicable Subsection of the 1992 Edition of ASME Section III. In addition, for Class 3 pressure retaining welds (butt and socket) a surface examination of the root layer shall be performed when those pressure retaining welds are required to have a surface examination performed in accordance with the 1992 Edition of ASME Section III. For those Class 3 welds receiving radiography in lieu of a surface examination in accordance with Section III, no additional surface examination of the root layer needs to be performed.
- (b) Prior to or immediately upon return to service, a visual examination (VT-2) shall be performed in conjunction with a system leakage test, using the 1992 Edition of ASME Section XI, in accordance with paragraph IWA-5000, at nominal operating pressure.
- (c) Use of this Code Case shall be documented on an applicable code form and included in the ISI Summary Report.

