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ACCESSION NBR: 8505220008 DOC. DATE: 85/05/17 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
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 RECIP. NAME: BUTLER, W.R. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Forwards request for relief for exams found impractical during preservice insp. program. Written response granting relief from ASME Section XI requirements requested.

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 #3992

Washington Public Power Supply System

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Docket No. 50-397

May 17, 1985
G02-85-255

850522000B 850517
PDR ADCK 05000397
Q PDR



Director of Nuclear Reactor Regulation
Attention: Mr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Butler:

Subject: NUCLEAR PLANT NO. 2
CPPR-93 PRESERVICE INSPECTION PROGRAM PLAN
REQUESTS FOR RELIEF

Reference: Letter G02-85-110, G.C. Sorensen (SS) to A. Schwencer
(NRC), "CPPR-93 Preservice Inspection Program Plan,
Amendment No. 4, Summary Report Supplement No. 1, NIS-1
Code Data Report," dated February 28, 1985.

Technical Specification 4.0.5 requires the Supply System to comply with ASME Section XI requirements unless specific written relief has been granted by the NRC. The WNP-2 Preservice Inspection (PSI) Summary Report, Supplement 1, was submitted to the NRC via the reference. This supplement contained four requests for relief for examinations the Supply System found impractical during PSI. This letter re-submits those requests for relief (attached) and requests that the NRC staff review and provide a written response granting the requested relief from the Code requirements.

In accordance with 10CFR170.12(f), an application fee of \$150.00 is provided.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

DPR/kr

Attachments: As stated

cc: J.O. Bradfute, NRC
W.S. Chin, BPA (399)
M.R. Humm, NRC
J.B. Martin, NRC
E. Revell, BPA (399)
N.S. Reynolds, BLP&R
A.D. Toth, NRC (901A)

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ATTACHMENT

REQUEST FOR RELIEF NO. PSI-2-001 (SUPPLEMENT)

Component or System ASME Class 1, Section XI Category B-J pressure retaining welds in piping. List attached.

Code All of the subject welds were designed and fabricated to ASME Section III Class 1. The Preservice Inspection is to be performed to the 1974 Edition Summer 1975 Addenda of ASME Section XI and Appendix III of the Winter 1975 Addenda.

Number of Welds

Category

No.

B-J

2

Section XI Requirements

Section XI requires examination of 100% of the pressure retaining welds in Categories B-J be performed completely as a Preservice Inspection before initial plant startup. The following examinations are required:

B-J

Circumferential and longitudinal piping welds
Branch pipe connection welds exceeding 6-inch diameter.

Volumetric
Volumetric

Branch pipe connection welds 6-inch diameter and smaller.

Surface

Socket welds.

Surface

Basis for Requesting Relief

Relief is required from ASME Section XI examination requirements on the basis of partial or total inaccessibility of the weld due to plant design. The specific inaccessibility problem for each weld is explained under remarks on the attached cables.

Alternative Examinations

The welds in this request for relief are partially or totally inaccessible to all examination methods.

Impact on Plant Quality and Safety

There will be no adverse impact on plant quality and safety by doing only a partial code examination of these welds.

1. The Class 1 piping welds have passed radiographic and dye penetrant examinations in accordance with Section III.

REQUEST FOR RELIEF NO. PSI-2-001 (SUPPLEMENT)

2. All of the identified welds will be subject to a system pressure test in accordance with Section XI Class 1 requirements.
3. Leak detection systems identify significant leakage in the areas of the subject piping welds. Appropriate operator action would occur due to leak detection system alarms.
4. Alternate systems can bring the reactor to a safe shutdown.
5. Other similar welds in the vessel or same piping run will receive full code examinations. The integrity of the pressure boundary can thus be verified by sampling.

CATEGORY B-J

ISO. NO.	WELD NUMBER	DATA SHEET NO.	SECTION XI EXAM	DESCRIPTION	SECTION III EXAM	REMARKS
RRC-104	2RRC(51)-1	XXX-XXX	PT	Nozzle to Forging		Inaccessible due to CRD housings. These welds are located at the centerline of the RPV and they are completely surrounded by the control rod drive mechanisms.
RRC-104	2RRC(51)-2	XXX-XXX	PT	Forging to Piping		Inaccessible due to CRD housings. These welds are located at the centerline of the RPV and they are completely surrounded by the control rod drive mechanisms.

REQUEST FOR RELIEF NO. PSI-2-002

Component
or System

Component support attachment welds. List attached.

Code

All of the subject welds were designed and fabricated to ASME Section III Class 2. The Preservice Inspection was performed to the 1974 Edition Summer 1975 Addenda of Section XI and Appendix III of the Winter 1975 Addenda.

Number of
Welds

Category

No. of Welds

C-E-1

2

Section XI
Requirements

Section XI requires 100% of the attachment weld to be examined by a surface method for Class 2.

Basis for
Requesting
Relief

Relief is required from ASME Section XI examination requirements on the basis of partial or total inaccessibility of the attachment weld due to plant design. The specific inaccessibility problem for each weld is explained under remarks on the attached tables.

Alternate
Examinations

The welds in this request for relief are partially or totally inaccessible to all examination methods.

Impact on
Plant Quality
and Safety

There will be no adverse impact on plant quality and safety by doing only a partial or no code examination of these welds.

CATEGORY C-E-1.

ISO. NO.	WELD NUMBER	DATA SHEET NO.	SECTION XI EXAM	DESCRIPTION	SECTION III EXAM	REMARKS
RHR-203	RHR-410(W)	XXX-XXX	SUR	Attachment weld		Not accessible - within shielding wall.
RHR-207	RHR-475(W)	XXX-XXX	SUR	Attachment weld		Not accessible - within shielding wall.

REQUEST FOR RELIEF NO. PSI-2-003

Component or System	Reactor Recirculation System line 4RRC(8). List attached.				
Code	All of the subject welds were designed and fabricated to ASME Section III, Class 1. The Preservice Inspection is to be performed to the 1974 Edition Summer 1975 Addenda of ASME Section XI and Appendix III of the Winter 1975 Addenda.				
Number of Welds	<table><thead><tr><th><u>Category</u></th><th><u>No. of Welds</u></th></tr></thead><tbody><tr><td>B-J</td><td>8</td></tr></tbody></table>	<u>Category</u>	<u>No. of Welds</u>	B-J	8
<u>Category</u>	<u>No. of Welds</u>				
B-J	8				
Section XI Requirement	These welds are subject to an ultrasonic examination using a calibration block of the same material as the pipe and the same nominal diameter and wall thickness.				
Basis for Requesting Relief	The calibration block used for the examinations was 4 inch schedule 40 where the piping is 4 inch schedule 80. An error in the construction specification lead to the use of the wrong schedule calibration block. A review of the examinations using the schedule 40 calibration block instead of the schedule 80 block concluded that the examinations were more sensitive. The weld thickness was approximately 0.3 inches, while the calibration block is 0.24 inches thick.				
Alternate Examination	None.				
Impact on Plant Quality and Safety	There will be no impact on plant quality and safety by using the schedule 40 calibration block instead of the schedule 80 calibration block. The use of the schedule 40 block will result in a more sensitive examination (thinner material, therefore, smaller notch for calibration reference).				

CATEGORY B-J

ISO. NO.	WELD NUMBER	DATA SHEET NO.	SECTION XI EXAM	DESCRIPTION	SECTION III EXAM
RRC-101	4RRC(8)1A-1	RRU-148	VOL	SWL to Pipe	RT/PT
RRC-101	4RRC(8)1A-2	RRU-152	VOL	Pipe to Flange	RT/PT
RRC-101	4RRC(8)2A-1	RRU-146	VOL	SWL to Pipe	RT/PT
RRC-101	4RRC(8)2A-2	RRU-147	VOL	Pipe to Flange	RT/PT
RRC-102	4RRC(8)1B-1	RRU-151	VOL	SWL to Pipe	RT/PT
RRC-102	4RRC(8)1B-2	RRU-150	VOL	Pipe to Flange	RT/PT
RRC-102	4RRC(8)2B-1	RRU-149	VOL	SWL to Pipe	RT/PT
RRC-102	4RRC(8)2B-2	RRU-153	VOL	Pipe to Flange	RT/PT

REQUEST FOR RELIEF NO. PSI-2-004

Component
or System

Component supports. List attached.

Code

The Preservice Inspection was performed to the 1974 Edition .
Summer 1975 Addenda of ASME Section XI with guidance from 1977
Edition Winter 1978 Addenda.

Number of
Welds

<u>Category</u>	<u>No. of Components</u>
C-E-1	1
N/A (Class 3)	17

Section XI
Requirements

Section XI requires 100% of the component support structure
from the pressure boundary to the supporting structure to be
visually examined.

Basis for
Requesting
Relief

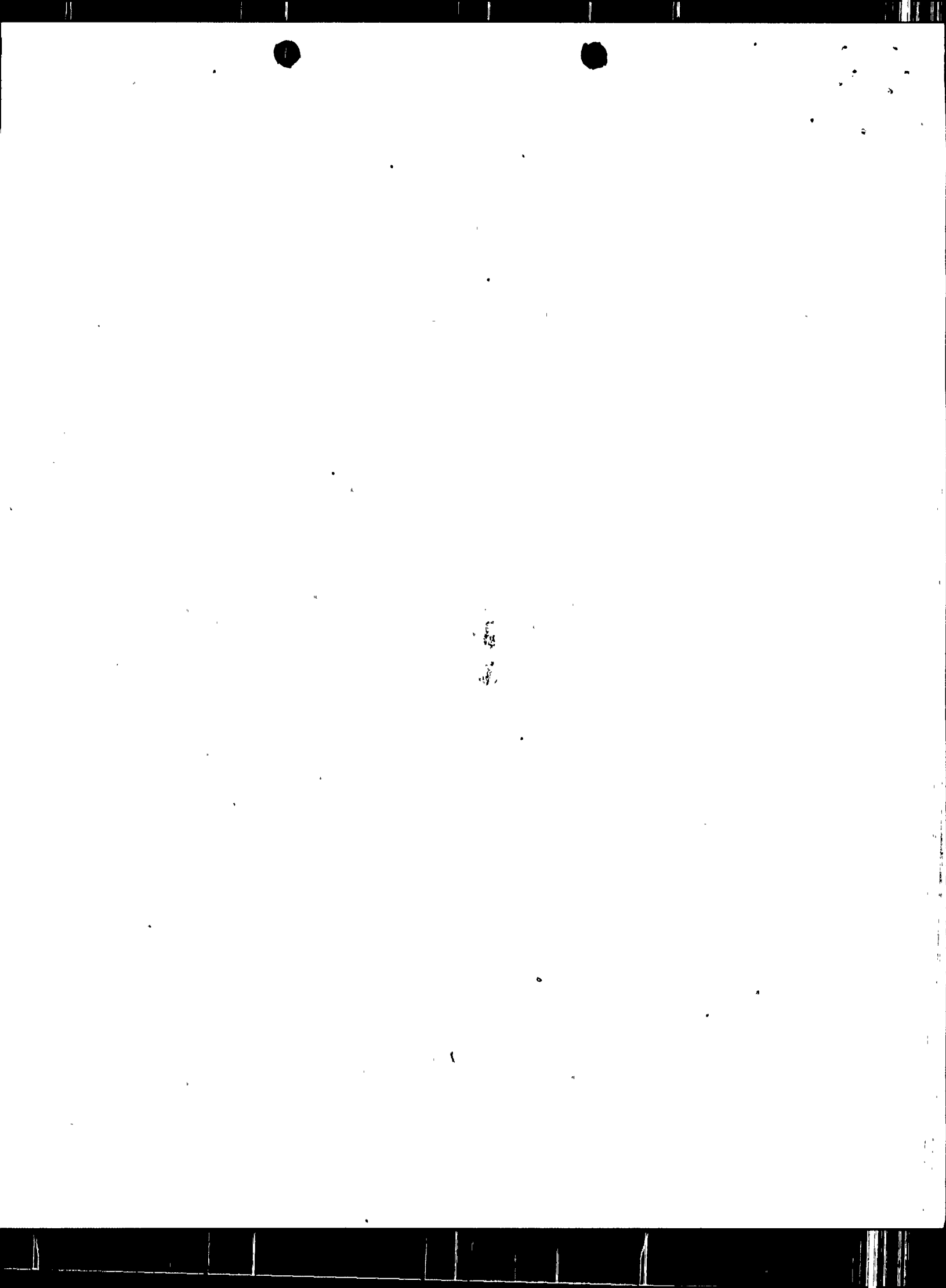
All of these component supports are inside bulkhead penetra-
tions and are covered by foam for fire protection which makes
them completely inaccessible to visual examination.

Alternate
Examinations

All components supports have been examined during construction
and found to be acceptable.

Impact on
Plant Quality
and Safety

None; all other components supports on these lines have been
examined and found acceptable. During inservice inspection the
adjacent supports will be examined. If the adjacent supports
fail, then these supports could be examined by removing the
foam fire barrier. This will only be done if there is reason
to suspect the subject supports have failed.



CATEGORY C-E-1 AND CLASS 3

ISO. NO.	SUPPORT NO.	DATA SHEET NO.	SECTION XI EXAM	DESCRIPTION	SECTION III EXAM	REMARKS
RCIC-205	RCIC-18	HV-0423	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-301	SW-60	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-301	SW-67	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-301	SW-69	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-301	SW-317	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-301	SW-72	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-301	SW-75	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-301	SW-77	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-303	SW-152	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-303	SW-431	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-303	SW-142	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-303	SW-203	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-303	SW-438	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-303	SW-137	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-305	SW-34	XX-XXXX	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.

CATEGORY C-E-1 AND CLASS 3

ISO. NO.	SUPPORT NO.	DATA SHEET NO.	SECTION XI EXAM	DESCRIPTION	SECTION III EXAM	REMARKS
SW-307	SW-916N	HV-1626	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-314	SW-946N	HV-1633	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.
SW-315	SW-951N	HV-1639	VT-3	Rigid	VT/SUR	Inaccessible due to foam filled penetrations.

