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AUTH.NAME AUTHOR AFFILIATION
SORENSEN,G.C. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards Request for Relief ISI-2-008 re ASME Section III Code 3 svc water buried piping.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

Docket No. 50-397

August 30, 1988
G02-88-188

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: NUCLEAR PLANT NO. 2
INSERVICE INSPECTION PROGRAM
REQUEST FOR RELIEF NO. ISI-2-008

In accordance with 10CFR50.55a, paragraph (g)(5)(iii), the Washington Public Power Supply System (Supply System) hereby submits request for relief No. ISI-2-008. The Supply System requests the Commission to review this request for relief (Attachment A) and grant the Supply System the requested relief from code requirements.

The Supply System has performed an evaluation and determined that conformance with the code requirement is impossible without extensive plant modification. An alternate examination is proposed that would not decrease the quality or safety of the plant by not performing the code required examination.

In accordance with 10CFR170.12(f) an application fee of $150 is provided. Should you have any questions, please contact Mr. A. G. Hosler, Manager, WNP-2 Licensing.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

HLA:DPR:lw

Attachments

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA - 399
NRC Site Inspector - 901A

A047
1/1
w/check #150
#16916

Subject: ISI Program - WNP-2
Request for Relief

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

I, G. C. Sorensen, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE 30 Aug, 1988

G. C. Sorensen, Manager
Regulatory Programs

On this day personally appeared before me G. C. Sorensen to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 30 day of August 1988.

S. R. Muchaus
Notary Public in and for the STATE
OF WASHINGTON

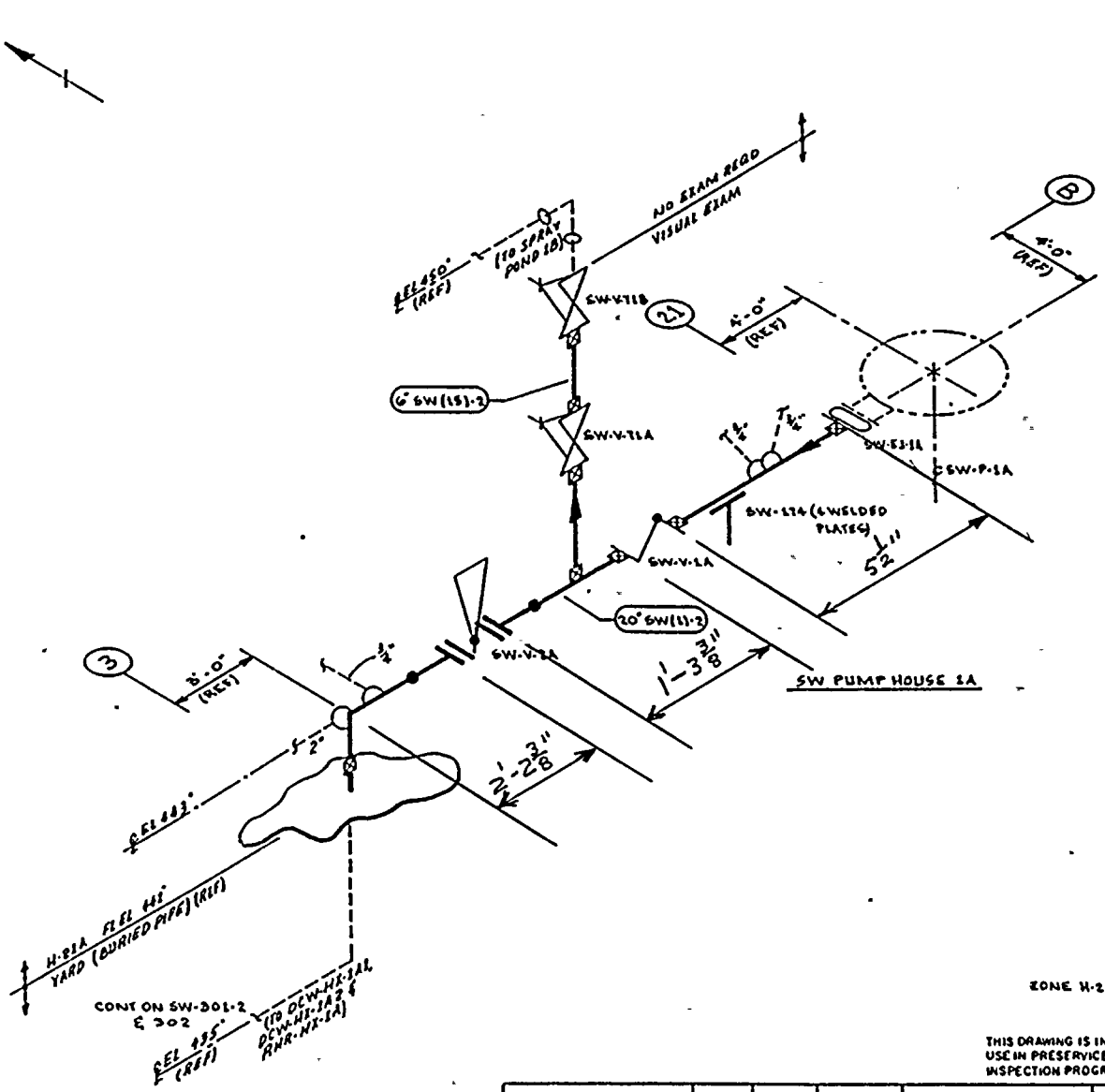
Residing at Richland, WA.

ATTACHMENT A

REQUEST FOR RELIEF NO. ISI-2-008

Component or System	ASME Section III Code Class 3 service water (SW) buried piping
Code	ASME Section XI 1980 Edition with Addenda through Winter 1980
Systems	The buried portions of the following systems are affected by this request for relief: SW Loop A Supply 20" SW (1)-2 SW Loop B Supply 20" SW (2)-2
Section XI Requirements	ASME Section XI (IWA-5244) requires a test to determine the change in flow between ends of non-isolatable, redundant buried piping.
Basis for Requesting Relief	The design of the piping in the service water pump houses prevents direct flow monitoring. Figures 1 and 2 (SW-301-1 and SW-305-1) attached to this request show the dimensions between the pump, valves and elbow. The close proximity of these items does not allow sufficient stable flow required for meaningful flow measurement. The direct measurement of flow at this end of the buried piping is impossible.
Alternate Examination	In place of the code required flow test, WNP-2 will verify that the flow during operation is adequate to perform the systems required function. This will be accomplished by verifying the flow and pump discharge pressure is within the acceptable range per the last pump and valve surveillance. In addition the area between the pump house and reactor building where the buried piping runs will be observed for any anomalies or disturbances which may indicate a leak each inspection period.

Impact on Plant Quality and Safety	There will be no decrease in Plant quality and safety by performing the alternate examinations. The service water system provides for heat removal for: a. Reactor decay heat during normal shutdown; b. RHR and diesel generators during and after transient and/or accident conditions; c. Essential pump motors and air handling cooling coils; and d. Fuel pool if normal cooling is lost. It also is capable of supplying water to flood the containment if required post-LOCA. To provide these functions, adequate flow is required. Per ASME Section XI, the pumps in both SW loop A and B are tested quarterly to verify that they are operating correctly and providing adequate flow. Per Section XI IWA-5244 verification of adequate flow is an acceptable test to perform as the VT-2 visual examination for buried piping. In addition to being recognized by the code, the alternate examination would be performed more frequently, quarterly vs once per inspection period. Based on more frequent testing, code acceptability and system function, the performance of the alternate examination will not decrease plant quality or safety.



NOTES:

1. THIS DRAWING IDENTIFIES PIPING & COMPONENTS SUBJECT ONLY TO A VISUAL EXAM FOR (1) EVIDENCE OF LEAKAGE DURING SYSTEM PRESSURE OR OPERABILITY TESTS; (2) PRESSURE DECAY TESTS OF BURIED PIPING; & (3) LOSS OF SUPPORT CAPABILITY OR INADEQUATE RESTRAINT FOR SUPPORTS & HANGERS ON PIPING EXCEEDING 4" NOM. TESTS SHALL BE CONDUCTED PER ASME SECTION XI, ARTICLES IWA-5000 & IWD-2000.
2. FOR BRANCH PIPING 4" NOM OR LESS (COMM SHOWN IN DASHED LINES) EXTEND VISUAL LEAKAGE EXAM THROUGH THE OUTERMOST NORMALLY CLOSED NUCLEAR CLASS VALVE, OR UNTIL TRANSITION TO INSTRUMENT TUBING, UNLESS OTHERWISE NOTED.

REFERENCES:

BOVEE & CRAIL ISOMETRICS

SW-250-1.3	REV 6
SW-291-1.6	REV 2
SW-250-1.3H	REV 0
SW-291-1.6H	REV 0

THIS DRAWING IS INTENDED FOR USE IN PRESERVICE AND INSERVICE INSPECTION PROGRAMS ONLY.

PIPING SYSTEM	NOM DIA (IN)	SCH	NOM WALL THK	MATERIAL SPECIFICATION	MATL TYPE	CAL BLOCK NO
20" SW(1)-2	20	STD	0.375	SA 106 GR B	CS	NA
6" SW(15)-2	6	STD	0.280	SA 106 GR B	CS	NA
6" SW(15)-2	6	160	0.719	SA 106 GR B	CS	NA

NO	DATE	REVISION	BY	CHKD	APPVD
0	11-5-80	ISSUED FOR USE			

QUALITY CLASS: 1 | ASME CODE CLASS 3

ENGR G.A. KUGLER | DRAWN K. McLA | DATE 10-20-78

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

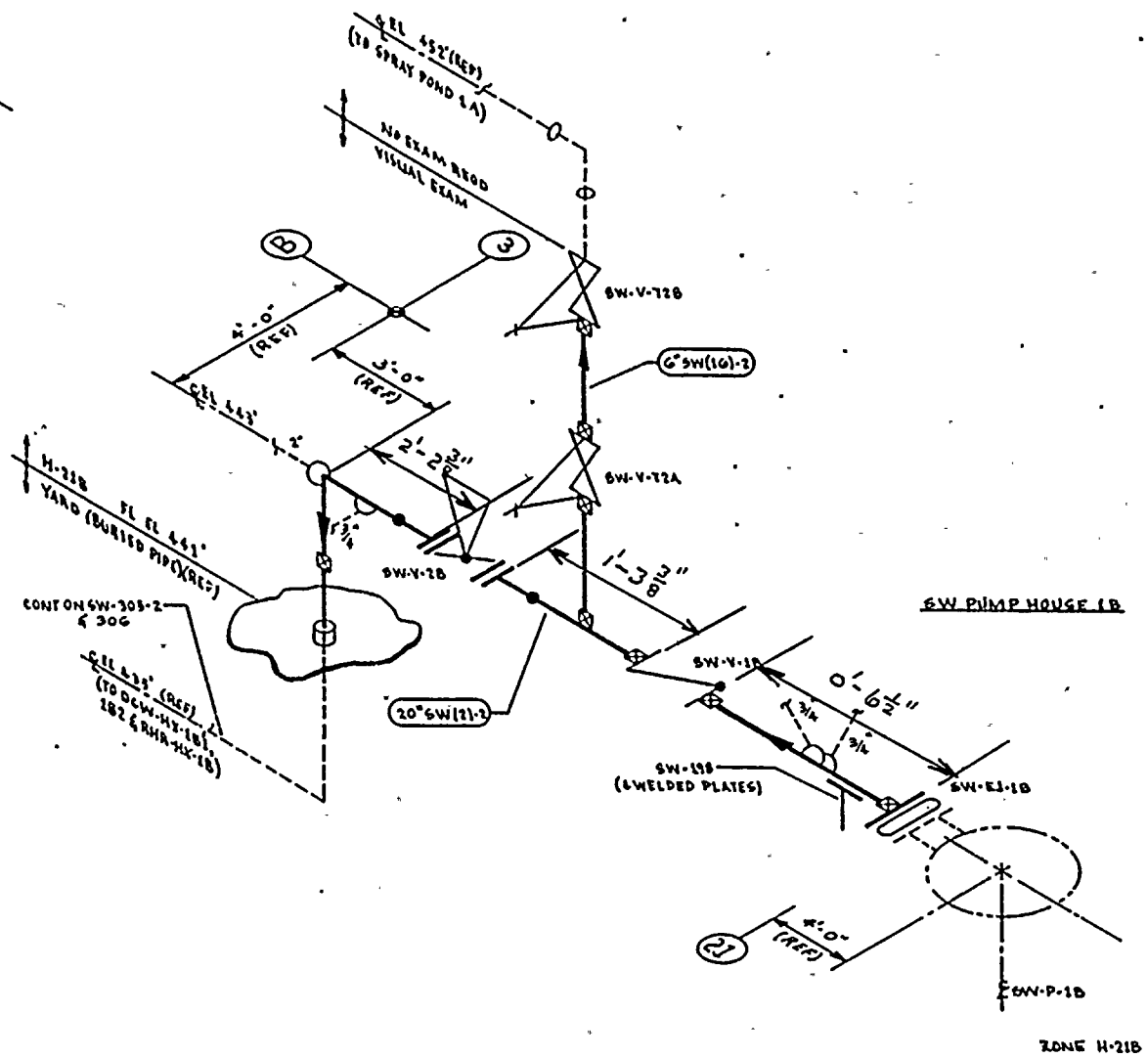
WNP-2
WELD & COMPONENT IDENTIFICATION DIAGRAM

TITLE: SW LOOP A SUPPLY
SW-P-1A DISCHARGE TO RHR-HX-1A

DWG NO: SW-301-1 | REV 0

Figure 1

F-2-008



NOTES:

1. THIS DRAWING IDENTIFIES PIPING & COMPONENTS SUBJECT ONLY TO A VISUAL EXAM FOR (1) EVIDENCE OF LEAKAGE DURING SYSTEM PRESSURE OR OPERABILITY TESTS; (2) PRESSURE DECAY TESTS OF BURIED PIPING & (3) LOSS OF SUPPORT CAPABILITY OR INADEQUATE RESTRAINT FOR SUPPORTS & HANGERS ON PIPING EXCEEDING 4" NOM. TESTS SHALL BE CONDUCTED PER ASME SECTION XI, ARTICLES IWA-5000 & IWD-2000.
2. FOR BRANCH PIPING 4" NOM OR LESS (CONN SHOWN IN DASHED) EXTEND VISUAL LEAKAGE EXAM THROUGH THE OUTERMOST NORMALLY CLOSED NUCLEAR CLASS VALVE, OR UNTIL TRANSITION TO INSTRUMENT TUBING, UNLESS OTHERWISE NOTED.

REFERENCES:

BOVEE & CRAIL ISOMETRICS

SW-291-1.3 REV 11
SW-292-1.5 REV B

N

KEYPLAN

THIS DRAWING IS INTENDED FOR USE IN PRESERVICE AND INSERVICE INSPECTION PROGRAMS ONLY.

PIPING SYSTEM	NOM DIA (IN)	SCH	NOM WALL THK	MATERIAL SPECIFICATION	MATL TYPE	CAL BLOCK NO
20" SW(21)-2	20	STD	0.375	SA 106 GR B	CS	NA
6" SW(16)-2	6	STD	0.280	SA 106 GR B	CS	NA
6" SW(16)-2	6	160	0.719	SA 106 GR B	CS	NA

NO	DATE	REVISION	BY	CHKD	APPVD
1	1.28.84	RELOCATED SW-19B ADDED KEYPLAN	KAA	CMK	TFH
0	11.5.80	ISSUED FOR USE	KAA	CMK	TFH

QUALITY CLASS: 1 | ASME CODE CLASS: 3

ENGR: G.A. KUGLER | DRAWN: K. McA | DATE 12-5-78

WASHINGTON PUBLIC POWER SUPPLY SYSTEM
RICHLAND WASHINGTON 99352

WNP-2
WELD & COMPONENT IDENTIFICATION DIAGRAM

TITLE:
SW LOOP B SUPPLY SW P-1B DISCHARGE

DWG NO: SW-305-1 | REV 1

Figure 2

7-2-008