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SUBJECT: Requests NRC approval to use ASME Code Case N-416-1, "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding,Class 1,2 & 3, Section XI,Div 1."

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May 2, 1995

AEP:NRC:0969AF

Docket Nos.: 50-315
50-316

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
REQUEST FOR APPROVAL TO USE ASME CODE CASE N-416-1

References: 1. Letter, Leif J. Norrholm to Donald C. Shelton, "Request for Approval of ASME Code Case N-416-1--Perry Nuclear Power Plant, Unit No. 1 (TAC No. M91005)," dated February 10, 1995.

2. Letter, John F. Stolz to Leon R. Eliason, "Salem Nuclear Generating Station, Units 1 and 2, and Hope Creek Generating Station, Request to Use an Alternate to ASME Code Section XI (TAC Nos. M91325, M91326, and M91327)," dated January 20, 995.

In accordance with 10 CFR 50.55a(a)(3), approval to use ASME Code Case N-416-1, "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2 and 3, Section XI, Division 1" at Donald C. Cook Nuclear Plant is requested. This code case, which was approved by the ASME Boiler and Pressure Vessel Committee on February 15, 1994, allows the use of a system leakage test in lieu of a hydrostatic test following the repair and/or replacement of Class 1, 2, and 3 components. A copy of the code case is enclosed. Our request is identical to those which have been approved for the Perry Nuclear Power Plant, the Salem Nuclear Plant, and the Hope Creek Nuclear Plant (see References 1 and 2), and its approval will eliminate the need to perform unnecessary hydrostatic testing during the next Unit 1 and Unit 2 refueling outages. The presently required hydrostatic testing is estimated to require 40 hours of outage critical path time for Unit 1 and 50 hours of outage critical path time for Unit 2.



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The system hydrostatic test is not a test of the structural integrity of the system. Rather, it is an enhanced leakage detection test. Leakage from Class 1, 2, and 3 systems is normally the result of erosion/corrosion or joint seal/sealant age deterioration and is readily apparent to inspectors during a system pressure test. Industry experience indicates that, in most cases, leaks are found when the system is at normal operating pressure. Thus, we consider that the alternate requirements proposed in Code Case N-416-1 constitute a reasonable, safe alternative to the existing hydrostatic testing requirements.

The Unit 1 hydrostatic tests that we propose to delete in favor of a system leakage test must currently be completed during the upcoming refueling outage which is scheduled to begin in September 1995. Thus, we request that approval of this request be granted prior to July 1, 1995, in order to apply the code case provisions during planning for the upcoming Unit 1 outage.

Sincerely,

for E. E. Fitzpatrick
Vice President

plt

Enclosure

cc: A. A. Blind
G. Charnoff
J. B. Martin
NFEM Section Chief
NRC Resident Inspector - Bridgman
J. R. Padgett

ENCLOSURE TO AEP:NRC:0969AF

CODE CASE N-416-1

Approval Date: February 15, 1994

*See Numeric Index for expiration and any reaffirmation dates.*

Case N-416-1
**Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2 and 3**
**Section XI, Division 1**

*Inquiry:* What alternative pressure test may be performed in lieu of the hydrostatic pressure test required by para. IWA-4000 for welded repairs or installation of replacement items by welding?

*Reply:* It is the opinion of the Committee that in lieu of performing the hydrostatic pressure test required by para. IWA-4000 for welded repairs or installation of replacement items by welding, a system leakage test may be used provided the following requirements are met.

*(a)* NDE shall be performed in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of Section III.

*(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 Section XI, in accordance with para. IWA-5000, at nominal operating pressure and temperature.

*(c)* Use of this Case shall be documented on an NIS-2 Form.

If the previous version of this case were used to defer a Class 2 hydrostatic test, the deferred test may be eliminated when the requirements of this revision are met.