

CATEGORY 1

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SUBJECT: Requests relief from requirements within ASME B&PV Code 1983 edition w/addenda through Summer 1983, Section XI, Subarticle-3420, "Valve Leak Rate Tests" through 960701. NRC suggested change to Unit 1 TS page 3/4 6-9, Section 3.6.1.6 encl.

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February 16, 1996

AEP:NRC:1215D
10 CFR 50.90
10 CFR 50.55(a)(3)

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 RELIEF FROM SECTION XI, SUBARTICLE-3420
"VALVE LEAK RATE TEST" REQUIREMENTS

In our December 19, 1995, letter AEP:NRC:1215B, we requested that changes be made to technical specification sections 3/4.6.1.2, 3/4.6.1.3, 3/4.6.1.6, and 3/4.6.1.7 for units 1 and 2 in accordance with the rulemaking included in 10 CFR 50, Appendix J, Option B. The letter notified the Office of Nuclear Reactor Regulation (NRR) of the intent to implement a performance-based containment leak rate testing program at Donald C. Cook Nuclear Plant in accordance with 10 CFR 50, Appendix J, Option B. The letter also contained the justification for changing to a performance-based frequency for leak rate testing of containment isolation valves. Using the same justification, we are hereby requesting relief from the testing requirements contained within ASME Boiler and Pressure Vessel (B&PV) Code 1983 edition, Section XI, Subarticle IWV-3420.

In accordance with 10 CFR 50.55a(a)(3), we request relief from the requirements contained within ASME B&PV Code 1983 edition with addenda through Summer 1983 for both units 1 and 2. Specifically, we request relief from Section XI, Subarticle-3420, "Valve Leak Rate Test." We are requesting the relief from Section XI

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specifications from now through July 1, 1996. This corresponds to the end of our current test interval.

As an alternative to the Section XI specifications, we request that the valve testing be performed in accordance with ASME/ANSI OMa-1988, Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants," Paragraph 4.2.2, "Valve Seat Leakage Rate Test." This alternative would allow Cook Nuclear Plant to test Category A Containment Isolation Valves in accordance with 10 CFR 50 Appendix J, Option B. Additionally, in accordance with 10 CFR 50.55a(b)(2)(vii), leakage rates for Category A containment isolation valves that do not provide a reactor coolant system pressure isolation function will be analyzed in accordance with paragraph 4.2.2.3(e) of Part 10, and corrective actions for these valves will be made in accordance with paragraph 4.2.2.3(f) of Part 10 of ASME/ANSI OMa-1988 Addenda to ASME/ANSI OM-1987.

The section XI relief is requested to allow Cook Nuclear Plant to deviate from the frequency requirements contained in the current section XI testing program. Performing testing in accordance with the current Section XI frequency requirements will result in additional outage work "without benefit to safety." It also has the potential to extend the outage duration creating additional outage-related costs.

This request is similar to a submittal made by Entergy Operations Inc. on November 22, 1995, to which the NRC granted an approving SER on December 14, 1995.

We request NRC approval of the proposed section XI relief by February 28, 1996, in conjunction with approval of our December 19, 1995, submittal for the Appendix J technical specification changes. This date will facilitate scheduling of work for the March 1996, refueling outage on Cook Nuclear Plant unit 2.

In addition, our NRR Project Manager suggested a change in the wording of the Limiting Condition for Operation in the current unit 1 technical specification page 3/4 6-9. Specifically, in section 3.6.1.6, remove the words "structure and steel liner" to be consistent with the unit 2 containment systems wording. Attachment 2 contains the revised unit 1 page 3/4 6-9 marked to reflect the changes. Attachment 3 contains the proposed revised page 3/4 6-9. The additional change is administrative in nature and does not

substantially revise our original submittal. Therefore, we do not believe that the changes require re-notification in the Federal Register.

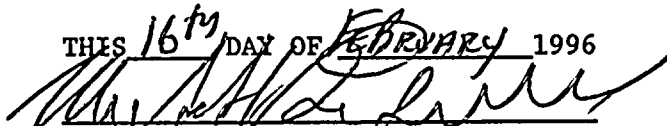
Sincerely,



E. E. Fitzpatrick
Vice President

SWORN TO AND SUBSCRIBED BEFORE ME

THIS 16th DAY OF FEBRUARY 1996


Notary Public

My Commission Expires: 3-9-96

eh

Attachments

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



ATTACHMENT 1 TO AEP:NRC:1215D

RELIEF REQUEST TO INCORPORATE
OMa-1988, PART 10 AND APPENDIX J, OPTION B

Relief Request

SYSTEM	Various
CODE CLASS	1,2
CATEGORY	A, A/C
COMPONENTS	Containment Isolation Valves (CIVs)
FUNCTION	Containment Isolation
TEST REQUIREMENT	ASME Boiler and Pressure Vessel (B&PV) Code 1983 edition with addenda through Summer 1983, Section XI, Subarticle IWV-3420, "VALVE LEAK RATE TEST"
BASIS FOR RELIEF	By rulemaking effective September 8, 1992, (see Federal Register Vol. 57, 34666), the U.S. Nuclear Regulatory Commission approved, by incorporation by reference, the 1989 edition of the ASME B&PV Code, Section XI. This edition of the ASME Code incorporates by reference ASME/ANSI OMa-1988, Part 10, into Section XI, Article IWV. OM-10 revised the requirements for valve leak rate testing including allowance for testing of CIVs in accordance with 10 CFR 50, Appendix J.
ALTERNATE TESTING	<p>Category A valve leakage testing shall be performed in accordance with ASME/ANSI OMa-1988, Part 10, "Inservice Testing of Valves in Light-Water Reactor Power Plants," Paragraph 4.2.2, "Valve Seat Leakage Rate Test."</p> <p>Additionally, in accordance with 10 CFR 50.55a (b)(2)(vii), leakage rates for Category A containment isolation valves that do not provide a reactor coolant system pressure isolation function will be analyzed in accordance with paragraph 4.2.2.3(e) of Part 10, and corrective actions for these valves will be made in accordance with paragraph 4.2.2.3(f) of part 10 of ASME/ANSI OMa-1988 Addenda to ASME/ANSI OM-1987.</p>

JUSTIFICATION

The justification for changing to a performance based leakage-rate testing approach for light water reactor containments is discussed in detail in the Federal Register (60 FR 49495) final rule notification for Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors, dated September 26, 1995. The rule change is based on analytical efforts documented in NUREG-1493, which confirms previous observations of the insensitivity of population risks from severe reactor accidents to containment leakage rates. The specific testing requirements are instituted in the Code of Federal Regulations by reference to Regulatory Guide 1.163 (September 1995), which in turn references industry guideline NEI 94-01, "Industry Guideline For Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," and ANSI/ANS-56.8-1994, "Containment System Leakage Testing Requirements." These documents provide the guidance for establishing a performance based leakage-rate testing program. Since the proposed relief request is consistent with the NRC's final rule, it is concluded that the relief request provides for an acceptable level of quality and safety.