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 Records Management Branch (Document Control Desk)

SUBJECT: Requests relief from provisions of 1989 ASME Code, Section XI
 for CSS nozzle welds, per 10CFR50.55a(g)(5)(iii). Relief
 request is applicable to both CSS heat exchangers in Units
 1 & 2.

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October 20, 1998

AEP:NRC:0969BO

Docket Nos: 50-315
50-316

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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
CODE RELIEF REQUEST FOR THE
CONTAINMENT SPRAY SYSTEM NOZZLE WELDS

Following a walkdown of the containment spray system (CTS) heat exchangers, it was determined that relief from the provisions of the 1989 ASME Code, Section XI is required. The CTS heat exchanger nozzle-to-shell weld has a nozzle reinforcing plate covering the nozzle-to-shell weld, making the code required outside surface examination impossible to perform. Relief for this weld was not required for the first and second ISI intervals because the code editions applicable during these intervals exempted the CTS heat exchangers. This exemption is not contained in the 1989 code edition, which is used for the third ten-year interval that began July 1, 1996. The need for relief was not recognized when the third ten-year plan was submitted.

This relief request (attachment) is being submitted under the provisions of 10 CFR 50.55a (g) (5) (iii), conformance with a code requirement is impractical. The relief request is applicable to both CTS heat exchangers in unit 1 and unit 2.

The CTS heat exchanger nozzle-to-shell welds are scheduled for examination during the second inspection period for unit 1 and during the third inspection period for unit 2. The second period ends June 30, 2003, and the fourth period ends June 30, 2006. Approval of the requests is requested prior to the beginning of the second inspection period, July 1, 1999.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. P. Powers', is written over a horizontal line.

R. P. Powers
Vice President

/jmc

Attachment

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c: J. A. Abramson
J. L. Caldwell, w/attachment
MDEQ - DW & RPD
NRC Resident Inspector, w/attachment
J. R. Sampson, w/attachment

Attachment to AEP:NRC:0969B0

Containment Spray Heat Exchanger
Nozzle-to-Shell Relief Weld Request

Background

The unit 1 and unit 2 containment spray (CTS) heat exchanger nozzles are fabricated with a welded reinforcement that prevents access to the nozzle-to-shell weld. Because of the presence of the reinforcement, an ASME Section XI, 1989 Edition required surface examination of the outer weld surface cannot be performed.

System/Component for Which Relief is Requested

Two class 2 nozzle-to-shell welds out of four total that exist on two CTS heat exchangers per unit require examination.

Code Requirements

ASME Section XI, 1989 Edition, Table IWC-2500-1, Examination Category C-B, Item No. C2.11, requires a surface examination of the outer surface of nozzle-to-shell welds on one of multiple non-exempt class 2 vessels of similar design, size, and service.

Basis for Code Relief

The required surface examination of the outer surface of the CTS heat exchanger nozzle-to-shell welds is impractical due to a welded reinforcement pad installed over the nozzle-to-shell weld. Access to the weld from the outside of the vessel is not possible without removing the attachment welds of the nozzle reinforcement pad and removing the reinforcement pad.

Alternative Method

It is proposed that, in lieu of the code required surface examination on the outer surface of the CTS heat exchanger nozzle-to-shell weld, a surface examination shall be performed on the inner surface of the class 2 nozzle-to-shell welds. This examination will be performed whenever the flanged cover of one of the CTS heat exchangers is disassembled for maintenance or other activities.

Justification for Granting Code Relief

A surface examination on the outer surface of the CTS heat exchanger nozzle-to-shell weld is not possible due to a welded reinforcement pad covering the weld. The alternative, performing a surface examination on the inner surface of the weld when the flanged cover of the heat exchanger is disassembled for maintenance or other activities, will provide a method for assessing the structural integrity of the weld.

There are no reported industry failures of these welds based on review of industry event reports. It is, therefore, concluded that the code relief requested above will not endanger life or property or otherwise compromise the common defense and security.

