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 AUTH. NAME AUTHOR AFFILIATION
 WOODY, C. O. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 THOMPSON, H. L. Division of Pressurized Water Reactor Licensing - A (post 8

SUBJECT: Requests approval to use ASME Boiler & Pressure Vessel Code
 Case N-416, "Alternative Rules for Hydrostatic Testing of
 Repair or Replacement of Class 2 Piping," to satisfy
 inservice pressure testing requirements.

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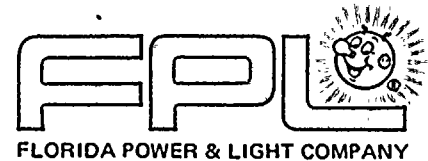
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SUBJECT: Requests approval to use ASME Boiler & Pressure Vessel Code Case N-416, "Alternative Rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping," to satisfy inservice pressure testing requirements.

THOMPSON, H.L. RECIPIENT NAME
WOODY, C.O. RECIPIENT AFFILIATION
Florida Power & Light Co.
AUTHOR AFFILIATION
50-251 Turkey Point Plant, Unit 4, Florida Power and Light Co. 05000251
FACIL: 50-250 Turkey Point Plant, Unit 3, Florida Power and Light Co. 05000250
ACCESSION NRG: 8404010280 DOC DATE: 84\03\25 NOTARIZED: NO DOCKET #



MAR 25 1988

L-86-121

Office of Nuclear Reactor Regulation
Attention: Mr. Hugh L. Thompson, Jr., Director
Division of PWR Licensing - A
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thompson:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Alternative Rules for Hydrostatic Testing
of Repair or Replacement of Class 2 Piping
Section XI, Division I

On March 30, 1984, Florida Power & Light Company (FPL) submitted the bases and plans for the Second Ten-Year Inservice Inspection Plan for Turkey Point Units 3 and 4. This plan addressed the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition through the Winter 1981 Addenda, subject to the limitations and modifications as stated in 10 CFR 50.55a(b)(2)(i).

The purpose of this letter is to request NRC approval to use ASME Boiler and Pressure Vessel Code Case N-416, Alternative Rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping, to satisfy the Inservice Pressure Testing Requirements of the ASME Code, Section XI, as permitted by 10 CFR 50.55a(a)(3). A copy of Code Case N-416 is attached.

For repair or replacement of Class 2 piping that cannot be isolated by existing valves or that require securing safety or relief valves for isolation, the pressure tests required by IWA-4400 will be deferred until the next regularly scheduled system hydrostatic tests (IWC-5000), with the repaired or replaced piping subject to the following conditions:

- (a) Prior to or immediately upon return to service, a visual (VT-2) examination for leakage shall be conducted during a system functional test or during a system inservice test in the repaired or replaced portion of the piping system.
- (b) The repair or replacement welds shall be examined in accordance with IWA-4000 and IWA-7000 using volumetric examination methods (IWA-2230) for full penetration welds or surface examination methods (IWA-2220) for partial penetration welds.

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PDR ADDCK 05000250
P PDR

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Mr. Hugh L. Thompson, Jr., Director
L-86-121
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The ASME Boiler and Pressure Vessel Code Committee approved Code Case N-416 on December 5, 1984.

The Nuclear Regulatory Commission approved it on April 15, 1985, and per discussion with your staff, this code case is scheduled to be included in the next revision (Rev. 5) of NRC Regulatory Guide 1.147.

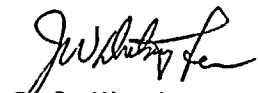
Performance of the pressure tests required by IWA-4400 would result in considerable exposure of personnel to radiation and significantly increase the risk of component damage or failure without compensating increase in the level of quality and safety.

Based on the above information Florida Power & Light Company requests approval to implement Code Case N-416 during the Second Ten-Year Inservice Inspection Interval for Turkey Point Unit 3, which began on February 22, 1984 and ends February 22, 1994 and Turkey Point Unit 4, which began on April 15, 1984 and ends on April 15, 1994.

In accordance with 10 CFR 170 an application fee of \$150.00 is attached.

If you or your staff have any questions or require any additional information, please do not hesitate to contact us.

Very truly yours,



C. O. Woody
Group Vice President
Nuclear Energy

COW/TCG/gp

Attachment: ASME Boiler and Pressure Vessel Code Case N-416
FPL Check No. 0702

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: December 5, 1984

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

Case N-416

**Alternative Rules for Hydrostatic Testing of Repair or
Replacement of Class 2 Piping
Section XI, Division 1**

E *Inquiry:* For Section XI, Division 1, repair or replacement of Class 2 piping that cannot be isolated by existing valves or that requires securing safety or relief valves for isolation, may the system hydrostatic test required by IWA-4400 (IWA-4210 in earlier Code editions) be deferred until the next regularly scheduled system hydrostatic test (IWC-5000) for that system?

E *Reply:* It is the opinion of the Committee that the system hydrostatic test required by IWA-4400 (IWA-4210 in earlier Code editions) for repair or replacement

of Class 2 piping that cannot be isolated by existing valves or that requires securing safety or relief valves for isolation may be deferred until the next regularly scheduled system hydrostatic tests (IWC-5000); provided both of the following conditions are met.

(a) Prior to or immediately upon return to service, a visual examination (VT-2) for leakage shall be conducted during a system functional test or during a system inservice test in the repaired or replaced portion of the piping system.

(b) The repair or replacement welds shall be examined in accordance with IWA-4000 and IWA-7000 using volumetric examination methods (IWA-2230) for full penetration welds or surface examination methods (IWA-2220) for partial penetration welds.

