

Duquesne Light Company

Beaver Valley Power Station
P.O. Box 4
Shippingport, PA 15077-0004

JOHN D. SIEBER
Senior Vice President and
Chief Nuclear Officer
Nuclear Power Division

(412) 393-5255
Fax (412) 643-8069

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Code Case N-416-1; Alternative Pressure Test
Requirement for Welded Repairs or Installation of
Replacement Items by Welding

The purpose of this submittal is to request approval, pursuant to 10 CFR 50.55a(a)(3), for the use of a system leakage test as an alternative pressure test in lieu of performing the hydrostatic pressure test required by ASME Section XI, IWA-4000 after welded repairs or installation of replacement items by welding.

Code Case N-416-1 of the ASME Boiler and Pressure Vessel Code (approved February 11, 1994) addresses the use of a system leakage test as an alternative pressure test in lieu of performing the hydrostatic pressure test required by IWA-4000 provided the following are met:

1. NDE shall be performed in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of ASME Section III.
2. Prior to or immediately upon return to service, a VT-2 visual examination shall be performed in conjunction with a system leakage test, using the 1992 Edition of ASME Section XI, in accordance with IWA-5000, at nominal operating pressure and temperature.
3. Use of the Case shall be documented on an NIS-2 Form.

The Beaver Valley plant design includes certain piping vent, drain, and test connections which have been determined to result in recurring maintenance activities. Specific design arrangements are being reevaluated which could reduce radiation exposure, maintenance activities, plant downtime, and forced outages. By utilizing this Code Case, the need for hydrostatic tests would decrease, thereby reducing the need for some of these connections.

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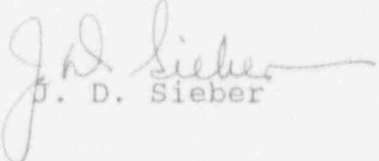
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Page 2

This alternative pressure test has been evaluated by the ASME Code Case Committee and determined to be an acceptable test following repair procedures. It is proposed that an acceptable level of quality and safety will be maintained by following the requirements put forth in Code Case N-416-1.

Beaver Valley Unit No. 1 is currently scheduled to begin its refueling outage on October 7, 1994. Approval to use this Code Case during the refueling outage would result in an immediate benefit associated with scheduled maintenance activities by permitting system leakage testing in place of hydrostatic testing. In addition, there are a number of valves which would no longer be needed to support hydrostatic testing and these valves could be removed and the lines capped during the outage. We request NRC review and approval on a schedule which would support the maintenance activities performed during the outage.

If you have any questions, please contact Mr. Steve Sovick at (412) 393-5211.

Sincerely,


J. D. Sieber

cc: Mr. L. W. Rossbach, Sr. Resident Inspector
Mr. T. T. Martin, NRC Region I Administrator
Mr. G. E. Edison, Project Manager