

**Florida
Power**
CORPORATION

November 2, 1981
File: 3-B-4
#3F-1181-02



Mr. John F. Stolz
Operating Reactors Branch No. 4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Crystal River Unit No. 3
Docket No. 50-302
Operating License No. DPR-72
Relief from ASME Pressure Testing Code

Dear Mr. Stolz:

By letter dated September 14, 1981, Florida Power Corporation requested relief from the ASME Code, Section XI regarding system pressure testing following modifications, repairs or replacements. The request was for generic relief from hydrostatic testing of the main feedwater piping between the steam generators and the first upstream isolation valves. The basis was that hydrostatic testing of this section of piping would also require filling the steam generators and main steam line with water up to the main steam stop valves. The main steam lines were not intended to carry water, and the excess weight could overstress the piping and associated supports. Other problems with this type of testing include the possibility of introduction of water to the turbine, and supplying adequate makeup water and pressure to account for leakage in relief and isolation valves.

Subsequent to our letter of September 14, Florida Power Corporation discussed alternative testing with your staff. We have concluded that a combination of magnetic particle testing and radiography of repair welds in this line would provide an acceptable alternative to hydrostatic testing.

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Mr. John F. Stolz

U.S. Nuclear Regulatory Commission

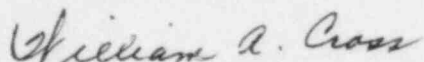
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Florida Power Corporation also requests extension of this exemption request to include the main steam lines, from the steam generators to the main steam stop valves. Hydrostatic testing of this section of piping would also be subject to the problems outlined above. Magnetic particle and radiographic examinations will also substitute for hydrostatic testing in this section of piping.

Your concurrence with the above program is requested by November 20, 1981.

Very truly yours,

FLORIDA POWER CORPORATION

A handwritten signature in cursive script that reads "William A. Cross".

W.A. Cross

Manager

Nuclear Licensing

EWf:cmd