



GULF STATES UTILITIES COMPANY

RIVER BEND STATION POST OFFICE BOX 220 ST. FRANCISVILLE, LOUISIANA 70775
AREA CODE 504 RBS-6094 345-8851

April 19, 1993
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U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555

Gentlemen:

River Bend Station - Unit 1
Docket No. 50-458

Enclosed please find Gulf States Utilities Company's (GSU) request for relief, RR0017, Revision 5, to the Inservice Inspection Program Plan. River Bend Station's (RBS) fifth refueling outage is scheduled to begin March 15, 1994. In order to meet the current outage scheduling requirements, GSU requests approval of RR0017 by December 1, 1993.

This letter also serves as notification that GSU is invoking Code Case N-498 from Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI, Division I," Revision 9, dated April 1992 for use at RBS. This will be reflected in the next revision of the Inservice Inspection Program Plan.

Should you have any questions or require further information, please contact Mr. L.L. Dietrich of my staff at (504) 381-4866.

Sincerely,

J.E. Booker
for J.E. Booker
Manager - Safety Assessment
and Quality Verification
River Bend Nuclear Group

LAE/LLD/CM/kvm
LAE/LLD/CM/kvm

Enclosure

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INSERVICE INSPECTION

REQUEST FOR RELIEF RR0017, REVISION 5

COMPONENT: ASME code Class 3 pressure retaining components, code categories D-A, D-B, and D-C.

CODE: Pressure retaining components were fabricated in accordance with ASME Section III, Class 3 requirements. Inservice examinations shall be performed in accordance with ASME Section XI, 1980 edition through and including winter 1981 Addenda.

CODE REQUIREMENTS

ASME SECTION XI: Pressure retaining components will receive a functional or inservice test and be VT-2 visually examined once each inspection period. They will also receive a hydrostatic or pneumatic test and be VT-2 visually examined once each inspection interval in accordance with ASME Section XI, IWD-2500-1, examination categories D-A, D-B, and D-C. Items D1.10, D2.10, and D3.10 respectively.

INFORMATION TO SUPPORT THE REQUEST FOR RELIEF CONSIDERATION:

In most cases hydrostatic and pneumatic tests performed on ASME Class 3 systems at RBS do not provide meaningful information. This is due to the fact that most ASME Class 3 systems at RBS are water or air systems that have a low design pressure and temperature. There are 12 systems containing 561 ASME Class 3 lines. Of those lines, approximately 88% have a design pressure of 150 psig or less and have a design temperature of less than 200 degrees Fahrenheit. Therefore, in many cases the test pressure is less than 25 psig above actual operating pressure.

REASONS RELIEF

SHOULD BE GRANTED: ASME Code Case N-498 provides alternative rules for 10-year hydrostatic pressure testing for ASME Class 1 and 2 Systems. An alternate should be considered for ASME Class 3 pressure retaining components.

GSU requests relief from hydrostatic and pneumatic testing for ASME Class 3 pressure retaining components. Instead of the

INSERVICE INSPECTION

REQUEST FOR RELIEF RR0017, REVISION 5

current hydrostatic and pneumatic testing, the following alternative testing will be performed:

- 1.) 100 percent of the required lines will receive a functional or inservice test with a VT-2 visual examination each inspection period in accordance with ASME code, Section XI, Class 3 requirements.
- 2.) The boundary subject to test pressurization shall extend to all Class 3 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve (including a safety relief valve) or valve capable of automatic closure when the safety function is required.
- 3.) Prior to performing VT-2 visual examination, the system shall be pressurized to nominal operating pressure for a minimum of 4 hours for insulated systems and 10 minutes for systems which are not insulated. The system shall be maintained at nominal operating pressure during the performance of the VT-2 visual examination.

NOTE - The VT-2 visual examination shall include all components within the boundary identified above.

This alternative to hydrostatic and pneumatic testing provides a number of benefits to GSU. Following are some examples:

- 1.) Decreased radiological waste since filling the system for testing and draining the system after test completion is not required.
- 2.) Decreased exposure since activities that require additional personnel to be in the test area (e.g., instrumentation isolation, venting, valve realignment, valve tagging, manning test equipment, making test connections, etc...) are limited.
- 3.) The possibility of overpressurizing interconnecting systems due to unsuspecting valve seat leakage no longer exists.