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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-498-1; Alternative Rules for 10-Year System  
Hydrostatic Testing for Class 1, 2, and 3 Systems

Beaver Valley Power Station Units 1 and 2 are both currently in the third period of their respective ten year ISI inspection intervals. The inspection and test programs for these units are conducted in accordance with the requirements of ASME Code Section XI, 1983 Edition, Summer 1983 Addenda. The code requires that hydrostatic tests be performed once during the 10 year interval, at or near the end of the interval. Code Case N-498-1, which delineates alternatives to the performance of these hydrostatic tests, was recently approved by the Boiler and Pressure Vessel Committee and, as a result, has not yet been included in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability - ASME Section XI Division I."

Code Case N-498-1 provides for an alternative to hydrostatic testing which will retain an acceptable level of quality and safety for Class 1, 2, and 3 systems. Duquesne Light Company previously received permission to use Code Case N-498 (for Class 1 and 2 systems only) via NRC letter S/N BV-91-057, dated December 24, 1991 (attached). This code case was revised to include Class 3 systems. The Subcommittee Working Group on Pressure Testing (SWGPT) concluded that, as with Class 1 and 2 systems, no additional benefit would be gained by conducting the existing Class 3 system hydrostatic tests versus performing leak tests at nominal operating pressure. The conclusion of the group was that hydrostatic testing does not verify structural integrity, and in fact, the slightly higher test pressures currently called for in the code could result in operational difficulties as well as extended outages and increased costs. By implementing the alternative testing provisions of Code Case N-498-1, personnel radiation exposure, outage testing time, and costs can be significantly reduced.



The Nuclear Professionals

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Therefore, this submittal is requesting approval pursuant to 10 CFR 50.55a(a)(3), for the use of Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems."

NRC approval is requested in a time frame that will support implementation of the code case requirement for the Unit 1 tenth refueling outage currently scheduled to begin in mid-October of 1994.

If you have any questions regarding this request or require additional information, please contact Mr. Nelson R. Tonet at (412) 393-5210.

Sincerely,



Thomas P. Noonan  
Division Vice President  
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cc: Mr. L. W. Rossbach, Sr. Resident Inspector  
Mr. T. T. Martin, NRC Region I Administrator  
Mr. G. E. Edison, Project Manager