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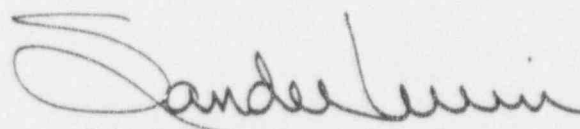
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
ASME Testing Requirements
One Time Requests for Relief

During the upcoming 15R refueling outage, modifications will be made to both trains of the Core Spray System at the Oyster Creek Nuclear Generating Station. Additionally, modifications to the Main Steam Drain Lines will be installed. Existing ASME Code requires a component modification or replacement to be hydro tested prior to resumption of service. Attachment I to this cover letter requests relief from this ASME requirement for these two specific modifications.

To allow adequate time for proper planning and scheduling, a response to this letter addressing the main steamline modification is requested by September 20, 1994. Additionally, a response to this letter addressing the core spray modification is requested by September 30, 1994. If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.


for John J. Barton
Vice President and Director
Oyster Creek

JJB/JJR
Attachment

cc: Oyster Creek NRC Project Manager
Administrator, Region I
Senior Resident Inspector

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Attachment I

RELIEF REQUEST PT-R4:

Pressure Testing Requirements Following Modifications in the 15R Refueling Outage for Class 2 Components of the Core Spray System and Class 1 Components of the Main Steamline Drain System

The following requests an alternative test for the hydrostatic testing requirements of IWA-4000 and IWA-5000, following repairs or replacements.

Requirement:

In accordance with IWA-4000 and IWA-5000, a hydrostatic pressure test shall be performed following repair or replacement of Class 1, 2, or 3 components by welding on the pressure retaining boundary.

Basis:

The performance of a hydrostatic test of pressure retaining components at elevated pressures, places a requirement on licensees with little benefit. It has been shown that a hydrostatic test at elevated pressure may achieve an increase in leakage rate when compared with a test run at nominal or normal operating pressures. However, in most cases this increase is negligible. This position has been supported by a review of industry data, material, and construction requirements.

There have been numerous publications and ASME documentation regarding the lack of value of a hydrostatic pressure test at elevated pressure. This led to the issuance of Code Case N-498, which eliminated the requirement to perform a hydrostatic test at elevated pressure for Class 1 and 2 systems as part of the periodic testing requirement. This Code Case was endorsed in Regulatory Guide 1.147. Equally lacking in value was the requirement to perform a hydrostatic pressure test at elevated pressures subsequent to repairs by welding and the attachment of replacements by welding. The ASME Committee has recognized this and consequently developed Code Case N-416-1 to provide an alternative. This Code Case was approved by the ASME Committee and was issued in Supplement 8 to ASME Code Cases, 1992 Edition.

Specific Modifications:

During the 15R refueling outage, portions of the Core Spray minimum flow recirculation system will be replaced. The affected piping is 1½ inch ASME Class 2. The Main Steamline Drain modification will replace two existing valves with two new valves. The affected valves and piping is 2 inch ASME Class 1.

The manpower and resource requirements (e.g. installation of scaffolding around the core spray booster pump check valves, blocking off of critical pathways, reassignment of key personnel from other essential work), which would have to be expended to meet the existing ASME requirement would extend the length of time that these systems will be out of service for modification by over 900 man hours. Additionally, there would be a considerable increase in the man-rem which would need to be expended to perform these low value hydrostatic tests.

Therefore, GPUN requests relief from the ASME requirements delineated above, and proposes the following alternative testing:

Alternative:

Testing and examination of both trains of the Core Spray System and the Main Steamline Drain system following modifications during the 15R outage will be performed in accordance with ASME Code Case N-416-1, approved on February 15, 1994 with additional requirements as delineated below.

For welded repairs and installation of replacements by welding as specified above, a system leakage test may be used provided:

ASME N-416-1 Requirements

- a) Baseline NDE will be performed in accordance with the methods and acceptance criteria of the applicable subsection, ASME Section III, 1992 Edition.
- b) Prior to or immediately upon return to service, a VT-2 visual examination will be performed in conjunction with a system leakage test at nominal operating pressure and temperature.
- c) Use of this case is documented on an NIS-2 form.

GPUN Additional Requirements

- a) Hydrostatic testing in accordance with ANSI B31.1, 1989 Edition, will be performed on the bench for welded connections prior to installation into plant systems.
- b) A surface examination of the root pass shall be performed for each weld that is excluded from the hydrostatic bench test.