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U-602346  
L30-94(10-10)LP  
8E.100c

October 10, 1994

Docket No. 50-461

10CFR50.55a

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Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Clinton Power Station (CPS) Withdrawal of Previous  
Request for Authorization Pursuant to 10CFR50.55a  
to Utilize ASME Section XI Code Case N-416-1

Dear Sir:

By letter dated September 9, 1994 (reference U-602342), Illinois Power (IP) requested approval to utilize ASME Code Case N-416-1 pursuant to 10CFR50.55a(1)(3) to perform alternate post-maintenance testing and examination in lieu of a system pressure test following repair and/or replacement of the steam admission valve in the Reactor Core Isolation Cooling (RCIC) system. IP's letter included an attachment that provided detailed information supporting the acceptability of using this Code Case for this particular situation at CPS.

In response to identified steam leakage into the RCIC system, IP anticipated that valve 1E51-F045 (RCIC steam admission valve) would likely require replacement during a RCIC system outage that was scheduled to start September 12, 1994. Replacement of the valve by welding would require a hydrostatic pressure test to be performed per the requirements of IWA-4000. Due to the difficulty and hardship involved in performing a post-maintenance hydrostatic pressure test on the affected portion of the RCIC system (as described in IP's submittal), IP considered another option, which was to request NRC approval to utilize ASME XI Code Case N-416-1 to perform alternative inspection and testing (system leakage test) in lieu of the hydrostatic test required per IWA-4000.

IP determined that performing alternative pressure test in accordance with Code Case N-416-1 (along with the inspection and examination required per the Code Case) would be the best approach. Utilizing Code Case N-416-1, when compared to the option of performing a hydrostatic test per the requirements of IWA-4000, would involve much less risk to personnel, equipment and plant safety, minimize RCIC unavailability and eliminate the hardships inherent to the hydrostatic pressure test. IP therefore submitted a request to utilize Code Case N-416-1 in accordance with 10CFR50.55a(1)(3).

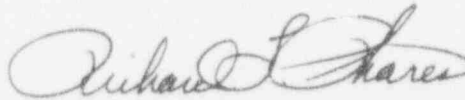
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At the time IP prepared and submitted its request, IP anticipated replacing the steam admission valve and performing the required testing and examination in accordance with the Code Case. Once the RCIC outage began however, IP was able to thoroughly investigate the leakage problems in the RCIC steam line. Testing of the steam admission valve (1E51-F045) and the steam admission valve bypass valve (1E51-F095) revealed that the leakage problem was not due to any problem with the steam admission valve, but rather, that the leakage was through the steam admission valve bypass valve. The steam admission valve bypass valve is situated in a one-inch line (a bypass line around valve 1E51-F045) and is exempt from hydrostatic pressure testing per the requirements of IWA-4000.

No work was performed on valve 1E51-F045. The repairs were performed on valve 1E51-F095 which is exempt from the hydrostatic testing requirements of IAW-4000 due to the size of the valve and associated piping (one inch) thus use of Code Case N-416-1 was not required. On September 12, 1994 the NRC Licensing Project Manager for CPS was notified of what IP had learned about the cause of the steam leakage into the RCIC system and that IP's request for NRC approval to utilize Code Case N-416-1 should not be processed. It was thus agreed that IP would submit a followup letter to withdraw its request. Accordingly, IP now respectfully withdraws its request for utilizing Code Case N-416-1 pursuant to 10CFR50.55a for this particular case.

Sincerely yours,



Richard F. Phares  
Director, Licensing

AJP/csm

cc: NRC Clinton Licensing Project Manager  
NRC Resident Office, V-690  
Regional Administrator, Region III, USNRC  
Illinois Department of Nuclear Safety