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Ref. # 10CFR50.55a(a)(3)(ii)

TUELECTRIC

October 25, 1994

C. Lance Terry
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
REQUEST APPROVAL AND USE OF ASME CODE CASE N-416-1

- REF:
- 1) (Unit 1: 1986 Edition of ASME Code, Section XI, No Addenda, Interval Start Date - August 13, 1990, First Interval; Unit 2: 1986 Edition of ASME Code, Section XI, No Addenda, Interval Start Date - August 3, 1993, First Interval)
 - 2) ASME Code Case N-416-1, "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement items by Welding, Class 1, 2 and 3, Section XI, Division 1," Dated February 15, 1994

Gentlemen:

TU Electric requests approval to use ASME Code Case N 416-1 (Enclosed) in lieu of performing the code required hydrostatic pressure test for welded repairs or installation of replacement items by welding.

Pursuant to 10CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The applicable ASME Code Editions for CPSES are noted in Reference 1.

Regulation 10CFR50.55a(a)(3)(ii) allows alternate requirements if compliance with the specified requirements of this section [10CFR50.55a(g)(4)] would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. TU Electric is requesting approval for the implementation of the alternative rules of ASME Section XI Code Case N-416-1 (Reference 2) for CPSES Unit 1 and 2.

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In lieu of hydrostatic pressure testing for welded repairs or installation of replacement items by welding, Code Case N-416-1 requires a visual examination (VT-2) be performed in conjunction with a system leakage testing using the 1992 Edition of Section XI, in accordance with paragraph IWA-5000, at nominal operation pressure and temperature. This code case also specifies that NDE of the welds be performed in accordance with the applicable Subsection of the 1992 Edition of Section III.

Considering the NDE performed on Code Class 1 and 2 systems and considering that the hydrostatic pressure tests rarely result in pressure boundary leaks that would not occur during system leakage tests, TU Electric believes that the increased assurance of the integrity of Class 1 and Class 2 welds is not commensurate with the burden of performing hydrostatic testing. However, for Code Class 3 components, TU Electric will implement the proposed alternative only if additional surface examinations are performed on the root pass layer of butt and socket welds on the pressure retaining boundary of Class 3 components.

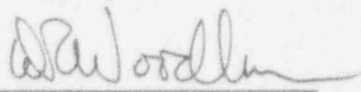
TU Electric considers the alternate testing requirements proposed in Reference 2 to constitute a reasonable, safe alternative to the existing hydrostatic testing requirements.

It is requested that approval of this code case be granted by the November 4, 1994, so that it may be used during the first refueling outage for Unit 2 which began on October 3, 1994, and during all subsequent refueling outages for Unit 1 and Unit 2. Timely approval is requested in order to obtain, through implementation of the code case, the maximum achievable cost savings and reduction in radiation exposure.

If you have any question please call Carl Corbin at (214) 812-8859.

Sincerely,

C. L. Terry

By: 
D. R. Woodlan
Docket Licensing Manager

CBC
Enclosure

c - Mr. L. J. Callan, Region IV
Mr. D. D. Chamberlain, Region IV
Resident Inspectors (2)
Mr. Tim Polich, NRR
Mr. G. Bynog, TDLS

CASE
N-416-1

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: February 15, 1994

*See Numeric Index for expiration
and any reaffirmation dates.*

Case N-416-1
Alternative Pressure Test Requirement for Welded
Repairs or Installation of Replacement Items by
Welding, Class 1, 2 and 3
Section XI, Division 1

Inquiry: What alternative pressure test may be performed in lieu of the hydrostatic pressure test required by para. IWA-4000 for welded repairs or installation of replacement items by welding?

Reply: It is the opinion of the Committee that in lieu of performing the hydrostatic pressure test required by para. IWA-4000 for welded repairs or installation of re-

placement items by welding, a system leakage test may be used provided the following requirements are met.

(a) NDE shall be performed in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of Section III.

(b) Prior to or immediately upon return to service, a visual examination (VT-2) shall be performed in conjunction with a system leakage test, using the 1992 Edition of Section XI, in accordance with para. IWA-5000, at nominal operating pressure and temperature.

(c) Use of this Case shall be documented on an NIS-2 Form.

If the previous version of this case were used to defer a Class 2 hydrostatic test, the deferred test may be eliminated when the requirements of this revision are met.