



**CENTERIOR  
ENERGY**

**PERRY NUCLEAR POWER PLANT**

10 CENTER ROAD  
PERRY, OHIO 44081  
(216) 259-3737

Mail Address:  
PO. BOX 97  
PERRY, OHIO 44081

**Robert A. Stratman**  
VICE PRESIDENT - NUCLEAR

October 31, 1994  
PY-CEI/NRR-1851L

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

Perry Nuclear Power Plant  
Docket No. 50-440  
Request for Approval of  
ASME Code Case N-416-1

Gentlemen:

In accordance with 10 CFR 50.55a(a)(3), approval to use American Society of Mechanical Engineers (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" at the Perry Nuclear Power Plant (PNPP) is hereby requested. This code case provides an alternative to hydrostatic testing following repair/replacement of Class 1, 2, and 3 components. The cited Code Case was approved by the ASME Boiler and Pressure Vessel Committee on February 15, 1994; however, this Code Case has not yet been endorsed in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI Division 1", due to its recent approval by ASME.

The Code Case allows a system pressure test to be performed in lieu of the hydrostatic pressure test, as required by paragraph IWA-4000 of ASME Section XI, for welded repairs or installation of replacement items by welding provided that: a) Non-destructive Examination (NDE) is 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) is performed in conjunction with the system leakage test, using the 1992 Edition of Section XI, in accordance with paragraph IWA-5000, at nominal operating pressure and temperature; and c) use of the Code Case is documented on an NIS-2 Form.

Endorsement of ASME Code Case N-498, "Alternative Rules for 10-Year Hydrostatic Pressure Testing for Class 1 and 2 Systems, Section XI, Division 1" by NRC in Regulatory Guide 1.147 has eliminated the requirement to perform the 10-year hydrostatic tests for ASME Class 1 and 2 systems, except for those hydrostatic

9411030354 941031  
PDR ADOCK 05000440  
P PDR

Operating Companies  
Cleveland Electric Illuminating  
Toledo Edison

AD47 10

October 31, 1994  
PY-CEI/NRR-1851L

tests which were deferred pursuant to ASME Code Case N-416. The approval of ASME Code Case N-416-1 will eliminate the need to perform any unnecessary hydrostatic tests during the next refueling outage (fifth refueling outage) and subsequent outages, and will result in substantial cost savings and reduced radiation exposure over the life of PNPP. The approval of this request is in accordance with 10 CFR 50.55a(a)(3) because compliance with the specified IWA-4000 requirements would result in hardship and unusual difficulty without a compensating increase in the level of quality and safety. The alternative system leakage test and inspection requirements specified by ASME Code Case N-416-1 would provide an acceptable level of quality and safety.

Approval of ASME Code Case N-416-1 for use at PNPP is requested by June 1, 1995, in order that planning for the fifth refueling outage, presently scheduled to begin in January 1996, may proceed with this consideration.

If you have questions or require additional information, please contact Mr. James D. Kloosterman, Manager - Regulatory Affairs, at (216) 280-5833.

Very truly yours,



RAS:RMC:sc

cc: NRC Regional Administrator, Region III  
NRC/NRR Project Manager, PNPP  
NRC Resident Inspector