



Northern States Power Company
Prairie Island Nuclear Generating Plant
1717 Wakonade Dr. East
Welch, Minnesota 55089

April 18, 1995

10 CFR Part 50
Section 50.55(a)

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

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket Nos. 50-282 License Nos. DPR-42
50-306 DPR-60

Request for Authorization to Utilize ASME
Boiler & Pressure Vessel Code Case N-416-1

The purpose of this letter is to request NRC authorization to utilize ASME Boiler and Pressure Vessel 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" (attached), during the Prairie Island Third Ten Year Inservice Inspection Interval. Code Case N-416-1 provides increased testing flexibility to the Owner, which should considerably reduce, if not eliminate, the need for the processing of relief requests associated with post weld repair/replacement hydrostatic testing. This request is submitted pursuant to 10 CFR Part 50, Section 50.55a(a)(3) and Section 50.55a Footnote 6.

Code Case N-416-1 was approved by the ASME Code on February 15, 1994. However, because it was only recently approved by ASME, the Code Case has not yet been endorsed in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1". Until the Code Case is generically endorsed by the Regulatory Guide, specific NRC authorization is required before it can be used.

During the upcoming Unit 2 outage, NSP expects to require relief from the Code requirements for ASME hydrostatic testing following repair or replacement activities. In each case, relief is necessary due to impracticality in testing, most commonly the inability to isolate the affected component from attached piping to allow a local hydrostatic test. These situations are encountered during routine modification and maintenance activities, but can

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also arise unexpectedly due to problems identified during outage inspection or testing activities.


Hardships are often encountered with hydrostatic testing performed in accordance with the Code. For example, since hydrostatic test pressure would be higher than nominal operation pressure, hydrostatic pressure testing frequently requires significant effort to set up and perform. The need to use special equipment, such as temporary attachment of test pumps and gauges, and the need for individual valve lineups can cause the testing to be on critical path.

10 CFR Part 50, Section 50.55(a)(3) allows the use of proposed alternatives to Code requirements provided it can be demonstrated that the proposed alternatives would provide an acceptable level of quality and safety. ASME approval of Code Case N-416-1 satisfies this requirement, and the NRC may authorize its use in accordance with 10 CFR Part 50, Section 50.55a, Footnote 6.

The 1995 refueling outage for Unit 2 is scheduled to begin on October 23, 1995 and all repair/replacement hydrostatic testing would have to be completed prior to or during heatup at the end of the outage. In lieu of submitting a specific relief request for all repair/replacement work that occurs during or following this outage, we intend to use Code Case N-416-1 to define post repair pressure testing requirements for any emergent ASME code repairs or replacements that may be required. NRC staff review and authorization of this request is therefore needed as soon as practical, preferably before the May 13, 1995. It is our plan to apply the code case to Unit 1 as well, although the next Unit 1 refueling is scheduled for January 1996, by which time the code case may be included in Reg Guide 1.147.

A similar request for authorization to use Code Case N-416-1 by Monticello Nuclear Generating Plant was approved by the NRC by letter dated November 2, 1994.

This letter contains no new NRC commitments. Please contact Jack Leveille (612-388-1121, Ext. 4662) if you require additional information.


Roger O Anderson
Director
Licensing and Management Issues

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NORTHERN STATES POWER COMPANY

c: Regional Administrator - Region III, NRC
Senior Resident Inspector, NRC
NRR Project Manager, NRC
J E Silberg

Attachment: ASME Code 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.