

**North  
Atlantic**

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The Northeast Utilities System

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NYN- 95029

March 30, 1995

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Reference: Facility Operating License No. NPF-86, Docket No. 50-443

Subject: Request to Use Alternatives to ASME Code Section XI (TAC M91849)

Gentlemen:

The purpose of this letter is for North Atlantic Energy Service Corporation (North Atlantic) to request the use of alternatives to the ASME Boiler and Pressure Vessel Code, Section XI, 1983 edition, through summer 1983 addendum for Seabrook Station pursuant to the provisions of 10 CFR 50.55a(a)(3). Specifically, North Atlantic requests approval to use the provisions of the following three Code cases:

- 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."
- Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing of Class 1, 2, and 3 Systems, Section XI, Division 1."
- Code Case N-522, "Pressure Testing of Containment Penetration Piping, Section XI, Division 1."

During the upcoming refueling outage, North Atlantic will be making Code repairs to Section XI components. These code repairs require that a Section XI hydrostatic test be performed. Code Case N-416-1 allows that a system leakage test be performed in lieu of a hydrostatic pressure test when Section XI Code repairs are made, provided certain requirements, as specified in the Code case are met.

In addition, during the upcoming refueling outage, North Atlantic is scheduled to perform several ten-year system hydrostatic tests. Code Case N-498-1 allows that certain pressure/leakage tests may be performed in lieu of ten-year system hydrostatic tests, provided certain additional requirements, as specified in the Code case, are met.

Also during the upcoming refueling outage, North Atlantic is scheduled to perform pressure testing of containment penetration piping in accordance with the requirements of both the Code and 10 CFR 50 Appendix J. The Appendix J local leak rate testing is substantially more comprehensive than the Code required functional testing, which entails a visual examination. Code Case N-522 allows the use of Appendix J testing in lieu of the redundant Code required functional testing.

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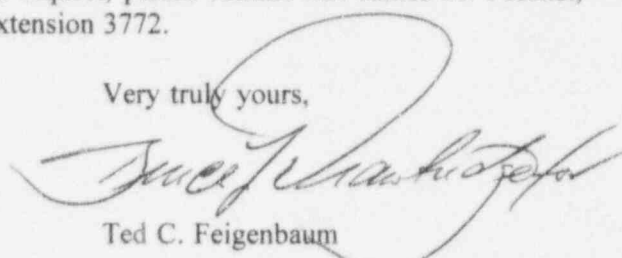
The performance of the aforementioned hydrostatic and functional tests, as currently required by the Code, would result in a substantial hardship to the plant in the form of additional expenditures of funds to perform the tests and additional radiation exposure to the individuals involved in the tests without realizing a commensurate gain in safety. The issuance of these Code cases by the ASME provides the basis for the approval of alternatives that have been determined by the ASME consensus process to provide an acceptable level of quality and safety.

North Atlantic is aware that the NRC has previously approved the use of Code Cases N-416-1 and N-498-1 for other licensees and that these Code cases will be incorporated into a future revision of Regulatory Guide 1.147. North Atlantic also understands that the NRC is currently in the process of performing a technical review of Code Case N-522.

North Atlantic requests approval to use the aforementioned Code cases by April 30, 1995, in order to facilitate planning for the next refueling outage, which is scheduled to begin on November 4, 1995.

Should you have any questions concerning this request, please contact Mr. James M. Peschel, Regulatory Compliance Manager, at (603) 474-9521, extension 3772.

Very truly yours,



Ted C. Feigenbaum

TCF:JES/jes

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