



Log # 1XX-92138
File # 10017
Ref. # 10CFR50.55a

March 12, 1992

William J. Cahill, Jr.
Group Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)-UNIT 1
DOCKET NO. 50-445
INSERVICE INSPECTION PROGRAM RELIEF REQUESTS

Gentlemen:

This letter requests relief from the inservice examination requirements. The requirements for the examinations are found in Section XI of the ASME Boiler and Pressure Vessel Code. The relief requests and related sketches are found in the attachments to this letter.

A brief description of the attachments (relief requests) is as follows:

Attachment 1

Relief Request: B-1

Item: RV closure head to flange weld and RV closure head ring to disc weld.

Examination Requirements: Table: IWB-2500-1
Category: B-A
Item No.: B1.40

Attachment 2

Relief Request: B-2

Item: Pipe to moment restraint circumferential weld.

Examination Requirements: Table: IWB-2500-1
Category: B-J
Item No.: B9.11

AD47

Attachment 3

Relief Request: B-3

Item: Pipe to reducing nozzle circumferential weld.

Examination Requirements: Table: IWB-2500-1
Category: B-J
Item No.: B9.11

Attachment 4

Relief Request: C-2

Item: Residual Heat Exchanger (RHR) Head to Shell Weld and RHR Shell to Flange Weld.

Examination Requirements: Table: IWC-2500-1
Category: C-A
Item No.: C1.10 and C1.20

Attachment 5

Relief Request: C-3

Item: Elbow and pipe circumferential welds.

Examination Requirements: Table: IWC-2500-1
Category: C-F-1
Item No.: C5.21

Attachment 6

Relief Request: C-4

Item: Piping Integral Welded Attachments.

Examination Requirements: Table: IWC-2500-1
Category: C-C
Item No.: C3.20

TXX-9213P
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Attachment 7

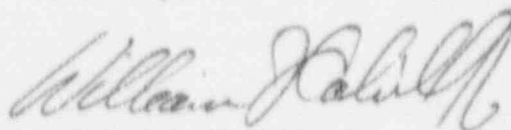
Relief Request: F-1

Item: Component Supports

Examination Requirements: Table: IWF-1300

We request that your approval be provided by July 31, 1992.

Sincerely,



William J. Cahill, Jr.

OB/tg
Attachments

c - Mr. R. D. Martin, Region IV
Mr. T. A. Bergman, NRR
Mr. G. Bynog, TDLS
Resident Inspectors (2)

Relief Request B-1

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for Which Relief is Requested: RV closure head to flange weld (TBX-1-1300-1) and RV closure head ring to disc weld (TBX-1-1300-2). See attached drawing.

Code Class: 1

Examination Requirements: Table: IWB-2500-1
Examination Category: B-A
Item No.: B1.40

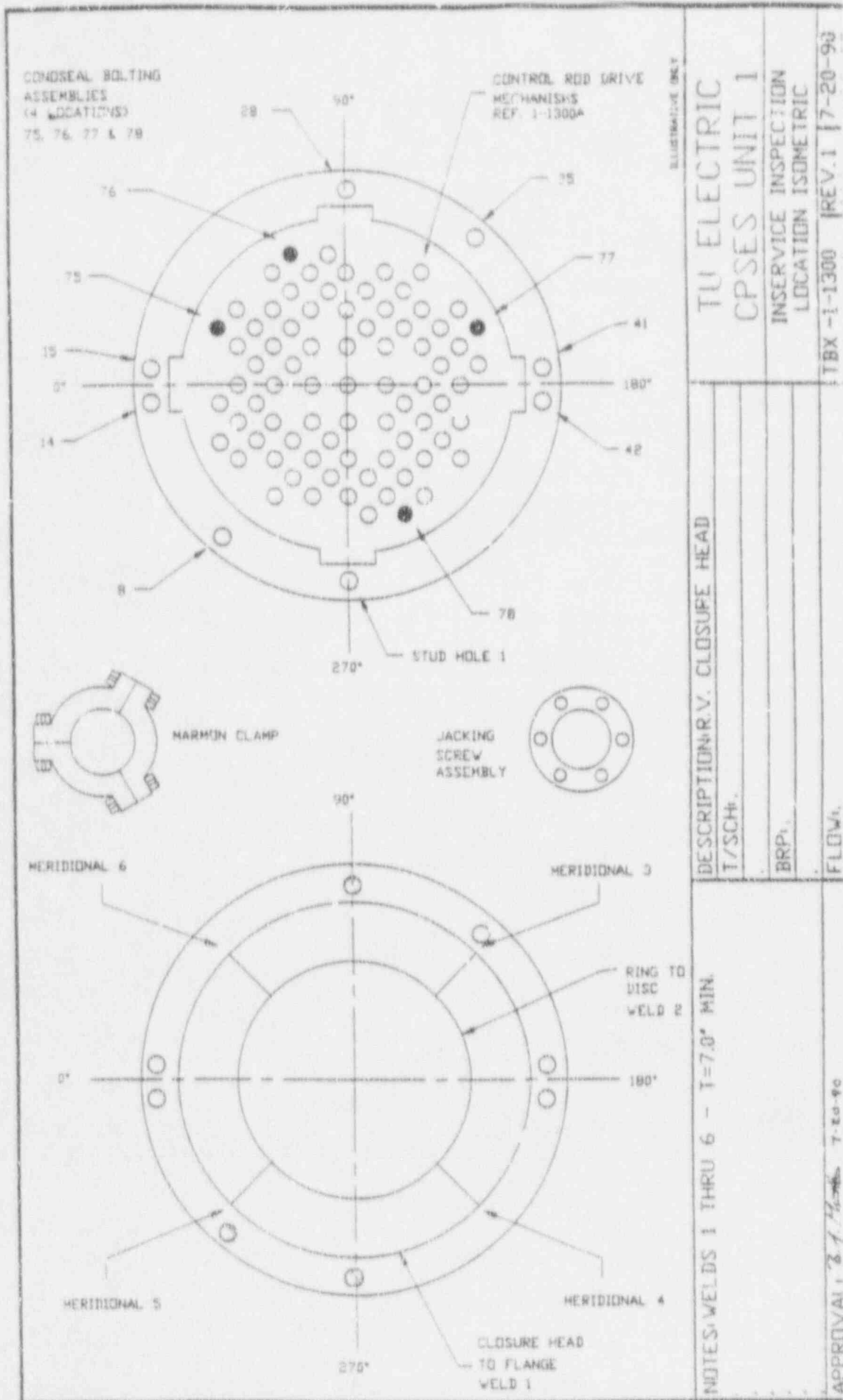
Table IWB-2500-1, Category B-A, Item No. B1.40 requires volumetric and surface examination of the reactor vessel head to flange weld and Item No. B1.21 requires volumetric examination of the reactor vessel circumferential head welds. The Plan requires that 1/3 of each of these welds be examined each period.

Basis for Relief: 1/3 of welds TBX-1-1300-1 and TBX-1-1300-2 were ultrasonically examined to the maximum extent possible, however, a portion of each was unable to be examined due to limitations encountered from the flange, shroud and a lifting lug. Required surface exam was performed and resulted in no indications. See attached Limitation to Examination sheet.

Alternate Examination: None

Safety Impact: The majority of each of these welds was examined and yielded no indications. There is no anticipated impact upon overall plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in exposure resulting from this relief request.



WESTINGHOUSE NUCLEAR SERVICE DIVISION
INSPECTION SERVICES

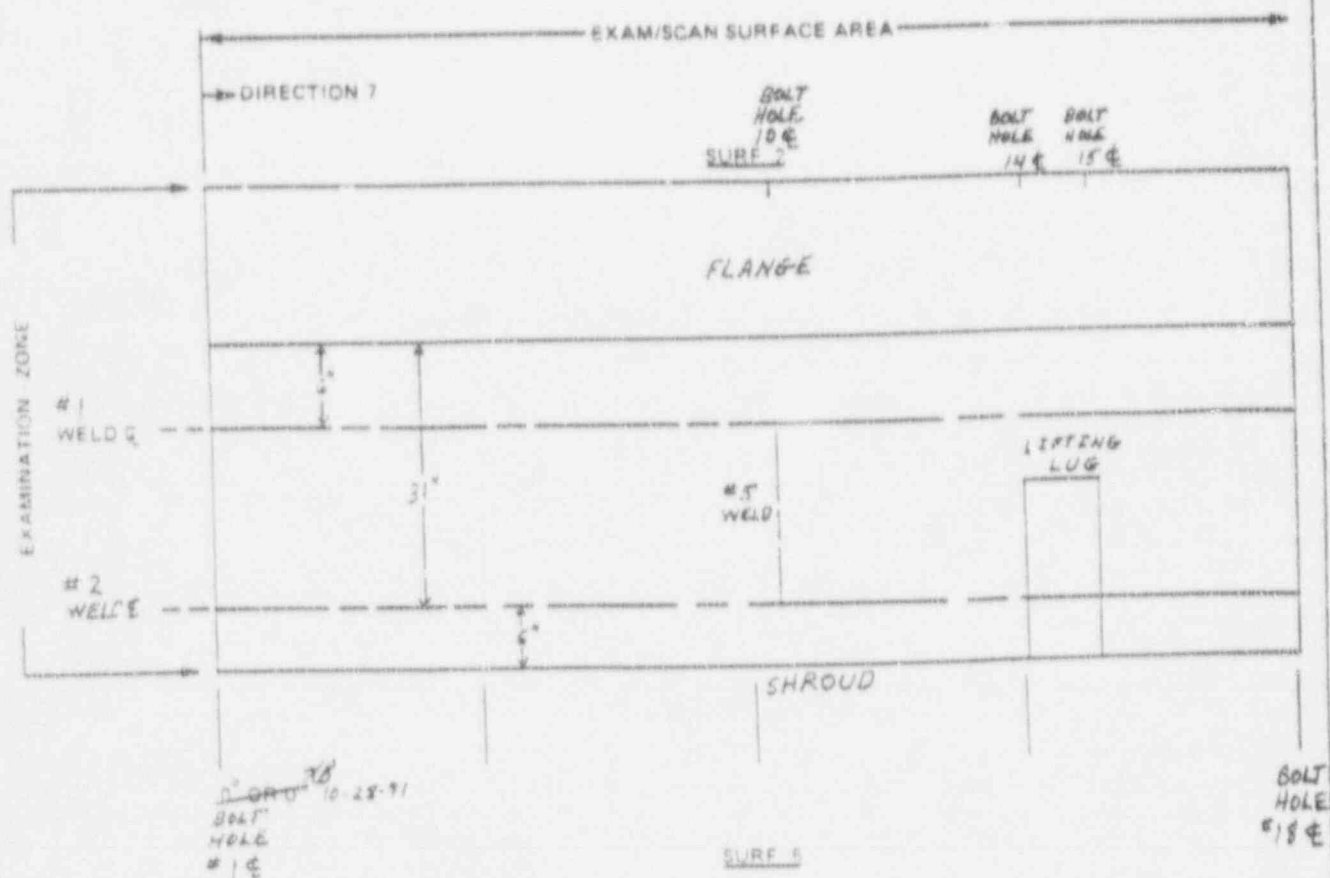
RB 2

LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK UNIT NO. 1 SKETCH TBR-1-1300 REV. 1
SYST/COMP R.V. CLOSURE HEAD PROCEDURE TX-IST-210 REV. 1
EXAMINER [Signature] DATE 10-28-91
LEVEL II

RELATED TO: U/T X P/T _____ M/T _____ V/T _____ ITEM(S) 1 2 + 5

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.



NOTE:

8% of weld #1 not examined using 45° angle beam
13% of weld #2 not examined using 45° angle beam
12% of weld #1 not examined using 60° angle beam
17% of weld #2 not examined using 60° angle beam

Relief Request B-2

Code Year: 1986 Edition. No Addenda ASME Section XI

Items for which Relief is Requested: Pipe to moment restraint
circumferential weld (TBX-1-4103-4).

Code Class: 1

Examination Requirements: Table: IWB-2500-1
Examination Category: B-J
Item No.: B9.11

Table IWB-2500-1, Category B-J, Item B9.11 requires surface and volumetric examination of circumferential pressure retaining welds in piping.

Basis for Relief: Weld TBX-1-4103-4 was ultrasonically examined to the maximum extent possible, however, a portion of the weld was unable to be examined due to limitations encountered from pipe nozzles and a component support. The required surface examination was performed and resulted in no indication. See attached Limitation to Examination sheet.

Alternative Examination: None

Safety Impact: This weld was examined to the maximum extent possible and yielded no indications. There is no anticipated impact upon the overall plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in exposure resulting from this relief request.

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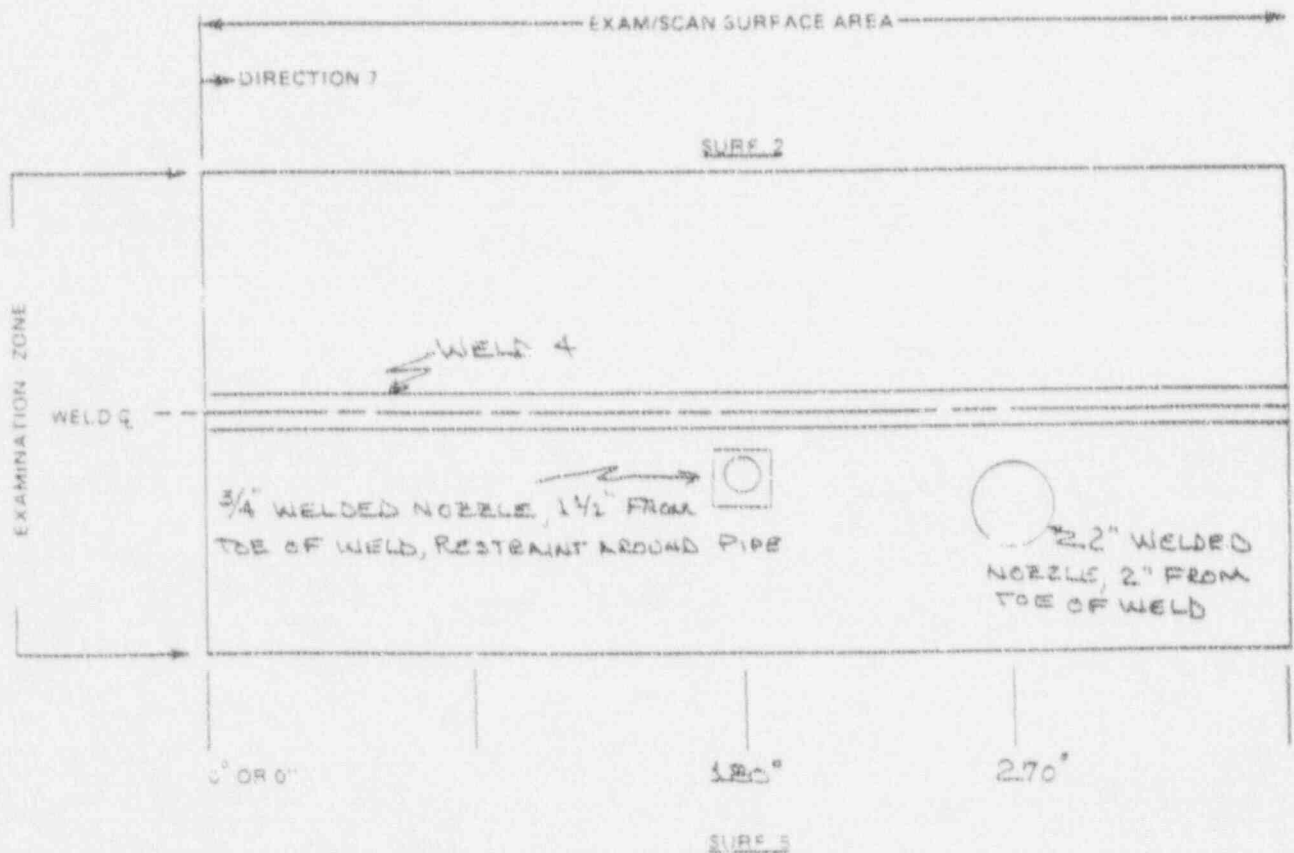
RB-2

LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK UNIT No. 2 SKETCH TBX-1-4103 REV 1
SYST/COMP SAFETY SECTION PROCEDURE TX-ISI-207 REV 0 FC1, 2 & 3
EXAMINER James R. Dellinger Robert J. Cant DATE 10-22-91
LEVEL II

RELATED TO: U/T X P/T _____ M/T _____ V _____ ITEM(S) WELD 4

PROVIDE GENERAL INFORMATION DESCRIBE APPROPRIATE SIZE, LOCATION AND TYPE OF LIMITATION.



2 WELDED NOZZLES AND BOX RESTRAINT LIMITS 8" OF SCAN, 3 1/2" OF 7 1/8 SCAN. 100% OF 2 SCAN ACCOMPLISHED BY COMBINATION OF 45° 60° SHEAR AND 70° LONGITUDINAL. APPROX 10% OF EXAMINATION VOLUME NOT EXAMINED.

Relief Request B-3

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for which Relief is Requested: Pipe to reducing nozzle
circumferential weld (TBX-1-4503-30).

Code Class: 1

Examination Requirements: Table: IWB-2500-1
Examination Category: B-J
Item No.: B9.11

Table IWB-2500-1, Category B-J, Item No. B9.11 requires surface and volumetric examination of circumferential pressure retaining welds in piping.

Basis for Relief: Weld TBX-1-4503-30 was ultrasonically examined to the maximum extent possible, however, a portion of the weld was unable to be examined due to limitations encountered from the reducing nozzle. The required surface examination was performed and resulted in no indications. See attached Limitation to Examination sheet.

Alternative Examination: None

Safety Impact: This weld was examined to the maximum extent possible and yielded no indications. There is no anticipated impact upon overall plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in exposure resulting from this relief request.

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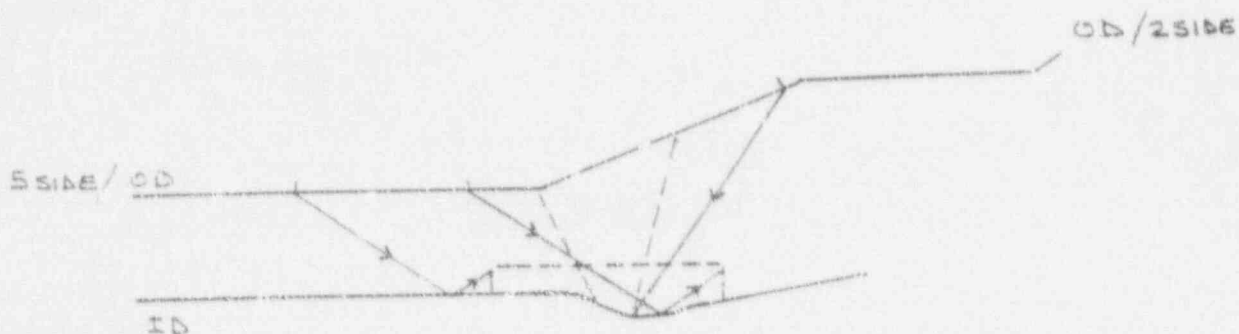
RB-3

LIMITATION TO EXAMINATION

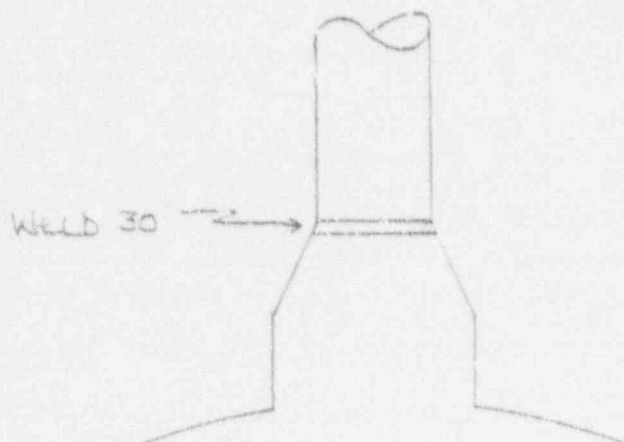
PLANT COMANCHE PEAK UNIT No. 1 SKETCH TRX-1-4503 REV 1
SYST COMP PRESSURIZER SPRAY PROCEDURE TX-ESI-207, REV. 0, FC1, 2, 3
EXAMINER James E. Sullivan DATE 10-31-91
LEVEL II

RELATED TO J/T X P/T _____ W/T _____ V/T _____ ITEM(S) WELD 30

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION



WELD CONFIGURATION (PIPE TO
REDUCING NOZZLE) RESTRICTS ALL
SCANS. APPROX. 15% OF EXAMINATION
VOLUME NOT EXAMINED.



Relief Request C-2

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for which Relief is Requested: Residual Heat Exchanger Head to Shell Weld (TBX-2-1120-1-1) and Residual Heat Exchanger Shell to Flange Weld (TBX-2-1120-1-2). See attached drawing.

Code Class: 2

Examination Requirement: Table: IWC-2500-1
Examination Category: C-A
Item No.: C1.10 and C1.20

Table IWC-2500-1, Category C-A, Item No. C1.20 requires 100% volumetric examination of the head to shell weld, and Item No. C1.10 requires 100% volumetric examination of the shell to flange weld.

Basis for Relief: Welds TBX-2-1120-1-1 and TBX-2-1120-1-2 were ultrasonically examined to the maximum extent possible, however, a portion of each weld was unable to be examined due to limitations encountered. See attached Limitation to Examination sheets.

Alternative Examination: None

Safety Impact: Each weld was examined to the maximum extent possible and yielded no indications. There is no anticipated impact upon overall plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in radiation exposure resulting from this relief request.

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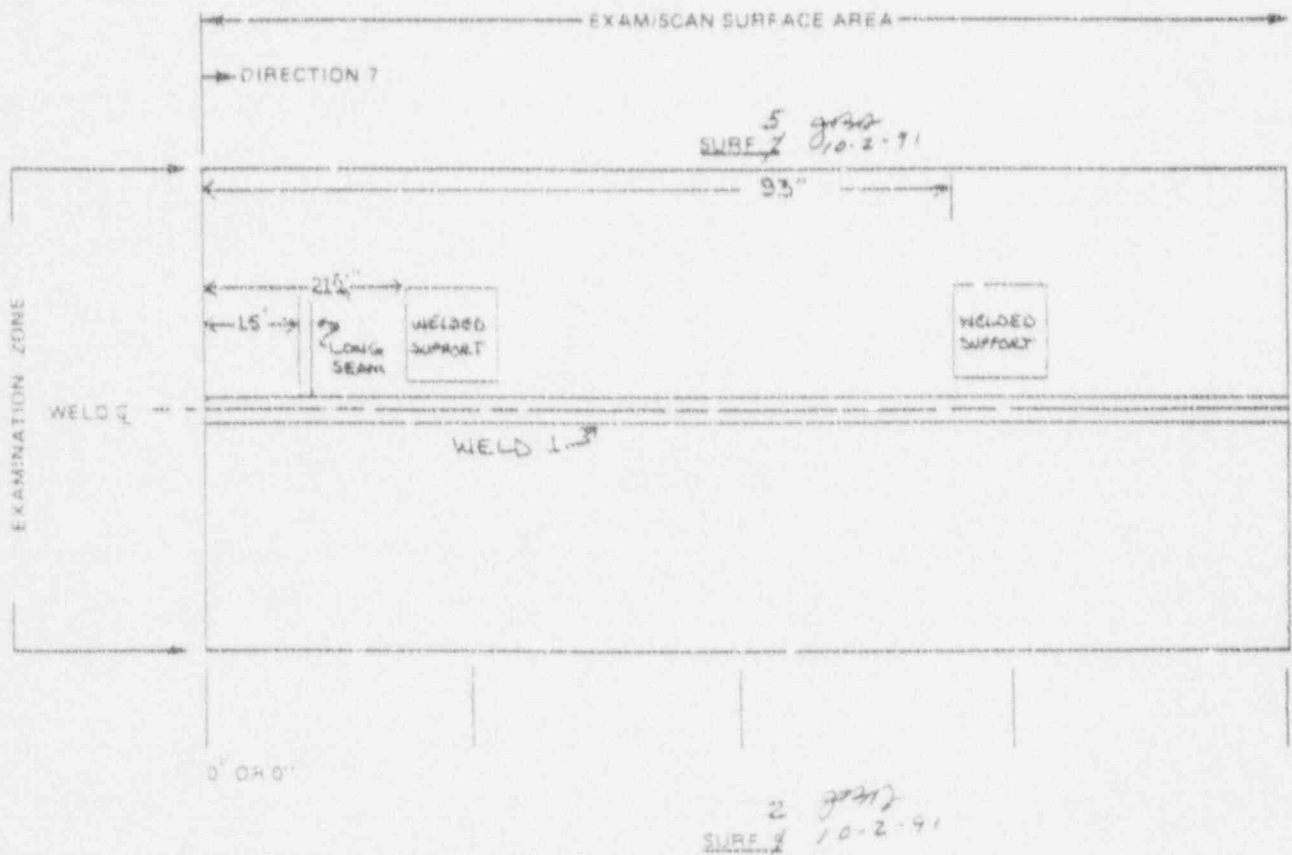
SB-6

LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK UNIT NO 1 SKETCH TBX-2-1120, REV 1
SYST/COMP RESIDUAL HEAT EXCHANGER PROCEDURE IX-ISI-209, REV 0, FC 1
EXAMINER JAMES E. Dellano 4/11/91 DATE 10-2-91
LEVEL II

RELATED TO: U/T X P/T _____ M/T _____ V/T _____ ITEM(S) WELD 1-1

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.



2 WELDED SUPPORTS RESTRICT 2, 7 & 8 SCANS.
APPROX. 18% OF EXAMINATION VOLUME NOT EXAMINED

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INSPECTION SERVICES

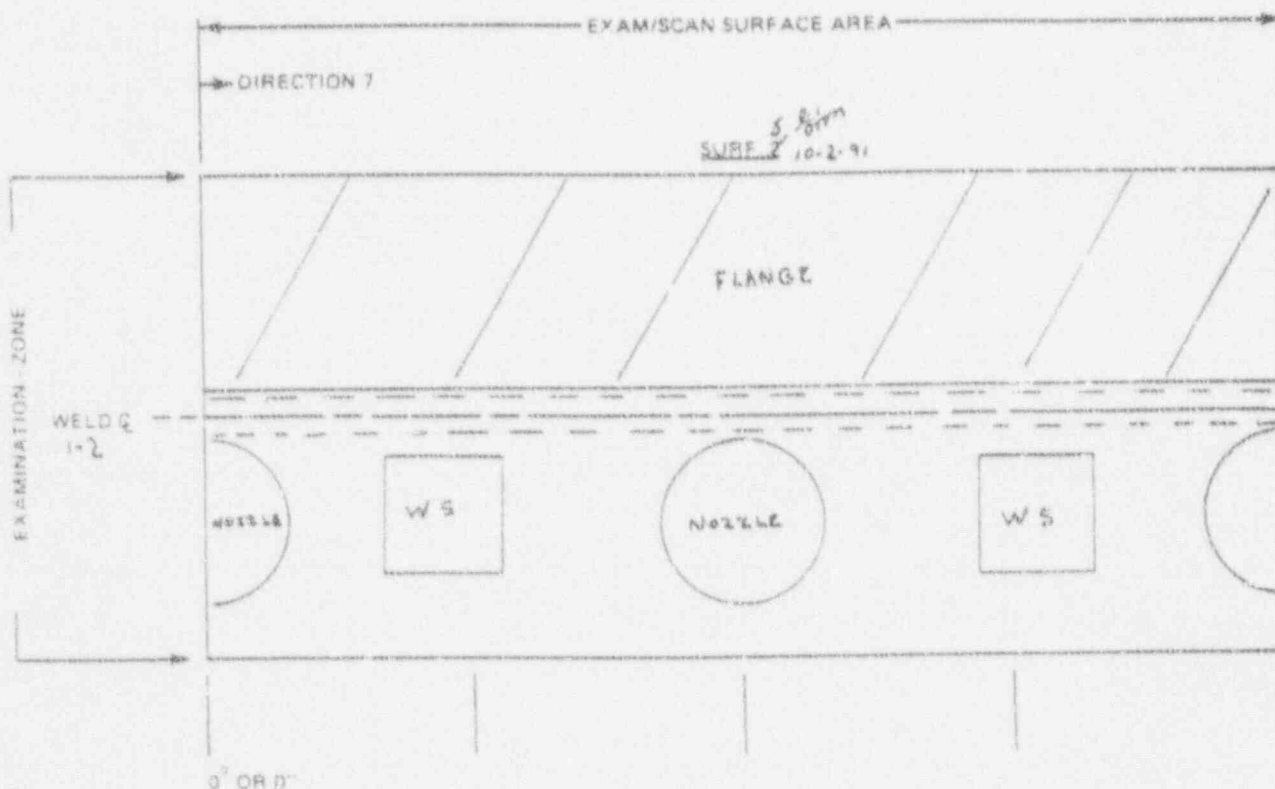
SB-6

LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK UNIT NO. 1 SKETCH TBX-2-1120 REV. 1
SYST/COMP RESIDUAL HEAT EXCHANGER PROCEDURE TX-151-209 REV 0 F.C. 1
EXAMINER [Signature] DATE 10-2-91
LEVEL II

RELATED TO: U/T X P/T _____ M/T _____ V/T _____ ITEM(S) WELD 1-2

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.



WELDED SUPPORTS + NOZZLES LIMITS 2 7/8 SCANS.

FLANGE RESTRICTS ALL SCANS.

42% NOT EXAMINED

Relief Request C-3

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for which Relief is Requested: Elbow and pipe circumferential welds
TBX-2-2570-32 and TBX-2-2570-33. See
attached drawing.

Code Class: 2

Examination Requirements: Table IWC-2500-1
Category: C-F-1
Item No.: C5.21

Table IWC-2500-1, Category C-F-1, Item No. C5.21 requires
100% surface and 100% volumetric examination of selected
circumferential welds.

Basis for Relief: Welds TBX-2-2570-32 and TBX-2-2570-33 were ultrasonically
examined to the maximum extent possible; however, a
portion of each weld was unable to be examined due to
limitations of the elbow intrados. Required surface
examinations were performed with no resulting
indications. See attached Limitation to Examination
sheet.

Alternative Examination: None

Safety Impact: The majority of each weld was examined and yielded no
indications. There is no anticipated impact upon overall
plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in radiation exposure resulting
from this relief request.

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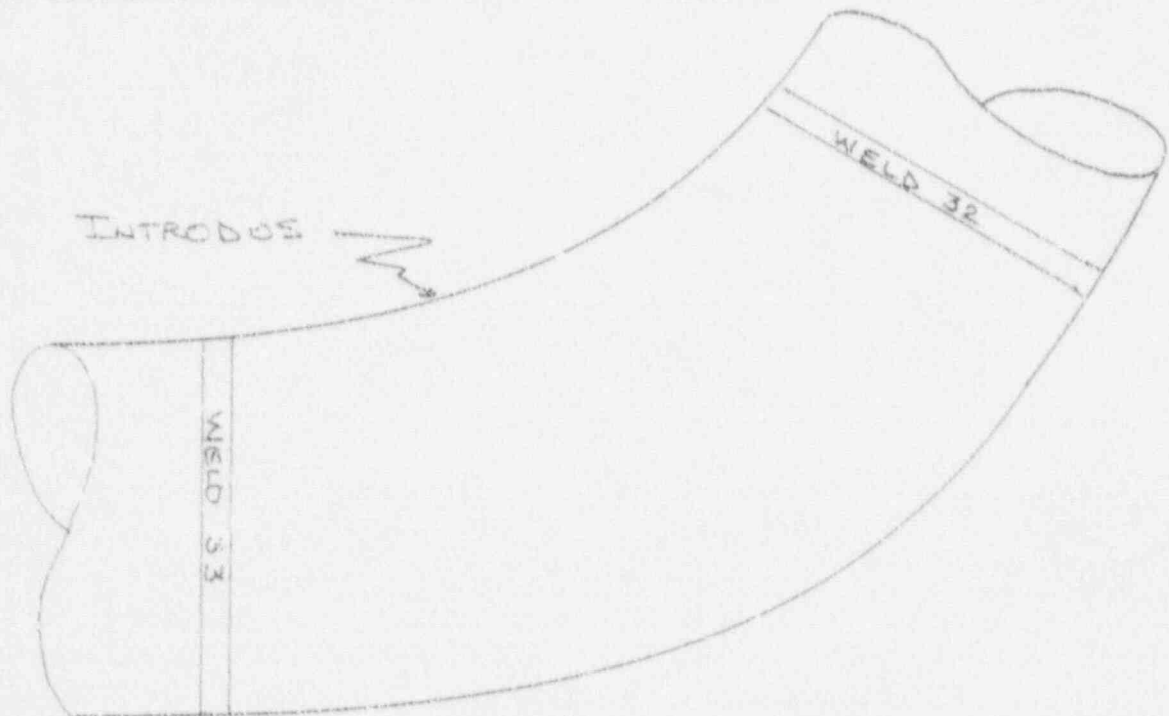
AB3

LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK UNIT NO. 1 SKETCH JBY-2-2570, REV. 1
SYST. COMP. CHARGING PUMP #2 DISCHARGE PROCEDURE TX-ISE-207 REV. 0, FC 178
EXAMINER James R. Dellano DATE 9-30-91
LEVEL II

RELATED TO D/T V P/T M/T V/T ITEM(S) WELDS 32 & 33

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.



INTRODOS OF 45° ELBOW RESTRICTS 4" OF
2 7/8 INCHES FOR WELD 32 AND 4" OF 5 7/8
INCHES FOR WELD 33 14% OF EXAMINATION
VOLUME FOR WELDS 32 AND 33 NOT EXAMINED

Relief Request C-4

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for which Relief is Requested: Piping Integral Welded Attachments
TBX-2-2536-H2 and TBX-2538-H-17. See
attached drawing.

Code Class: 2

Examination Requirements: Table: IWC-2500-1
Category: C-C
Item No.: C3.20

Table IWC-2500-1, Category C-C, Item No. C3.20 requires
100% surface examination of integrally welded attachments
to piping.

Basis for Relief: Integrally welded attachments TBX-2-2536-H2 and
TBX-2-2538-H17 were surface examined to the maximum
extent possible; however, a portion of each weld was
unable to be examined due to limitations associated with
welded spacers on the bottom surface of the top lugs.
See attached Limitation to Examination sheet.

Alternative Examination: None

Safety Impact: The majority of each of these welds were examined and
yielded no indications. There is no anticipated impact upon
overall plant quality and safety resulting from this relief
request.

Radiological Concerns: There is no change in radiation exposure resulting
from this relief request.

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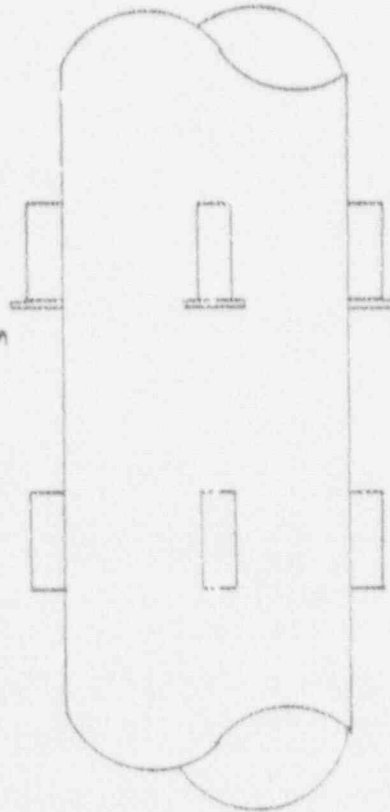
SB-5

LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK UNIT No. 1 SKETCH TBX-2-2536 REV. 2
SYST COMP CONTAINMENT SLAY PROCEDURE TX-IST-11 REV. 2
EXAMINER Charles W. Kiehl & John J. Kelly DATE 10-12-91
LEVEL II

RELATED TO U/T _____ P/T X W/T _____ V/T _____ ITEM(S) H2

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION



WELDED SPACERS ON BOTTOM SURFACE OF TOP LUGS
LIMITS $\frac{1}{2}$ " OF EXAM VOLUME ON LUG (4) TOTAL

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58-6

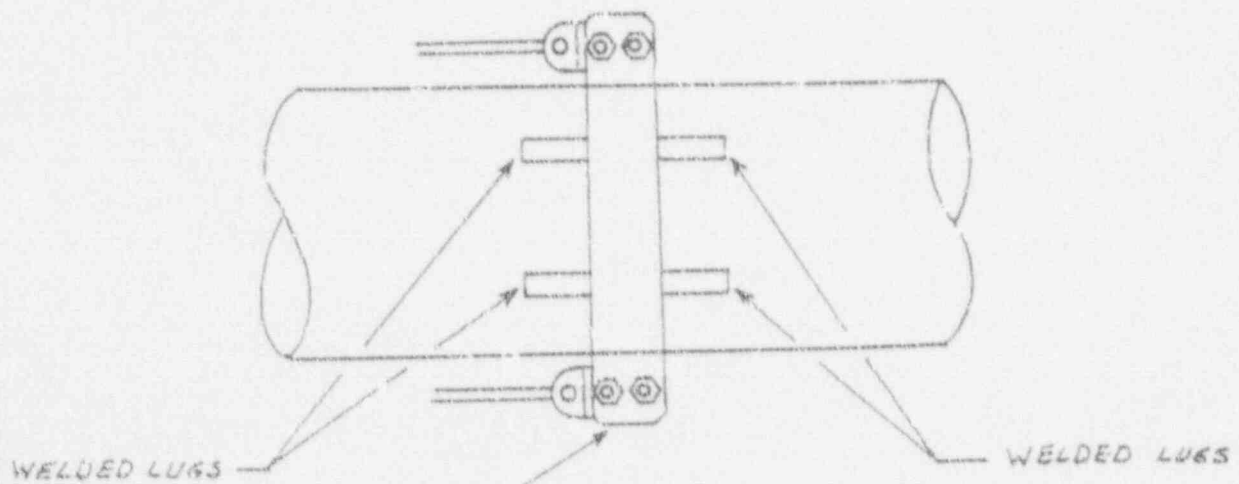
LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK UNIT NO. 1 SKETCH TBX-2-2538 REV. 2
SYST COMP CONTAINMENT SPRAY PROCEDURE TK-151-11 REV. 2
EXAMINER Harry M. Johnson Cliff W. Kell DATE 10-8-91
LEVEL II

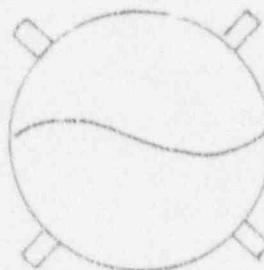
RELATED TO: U/T _____ P.T. ✓ M/T _____ V/T _____ ITEM(S) H17

PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.

TOP VIEW



FRONT VIEW



PIPE CLAMP RESTRICTS P.T. EXAMINATION ON ALL 8
WELDED LUGS 1/2" ON SIDES ADJACENT TO CLAMP

Relief Request F-1

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for which Relief is Requested: Component Supports.

Code Class: 3

Examination Requirements: IWF-1300 describes the boundaries of component supports requiring examination (VT-3).
IWF-1300(e) states:

"Where the mechanical connection of a non-integral support is buried within the component insulation, the support boundary may extend from the surface of the component insulation, provided the support either carries the weight of the component or serves as a structural restraint in compression."

Basis for Relief: For those portions of class 3 components supports that are buried in the insulation of the component and do not carry the weight of the component nor serve as a structural restraint in compression it is requested that those buried portions of the support not be examined. Removal and reinstallation of insulation on class 3 piping requires a significant amount of scaffolding erection/removal and man-power. For class 3 integral attachments insulation will be removed to perform code required examinations.

Alternate Examination: None

Safety Impact: There is no anticipated impact upon overall plant quality and safety resulting from this relief request as:

- 1) Only a small portion of the support is buried in insulation; therefore the majority of the support is examined.
- 2) The stress levels in those buried portions are usually low.

Radiological Concerns: Potential radiation exposure will be reduced by not having to:

- 1) install scaffolding,
- 2) remove insulation,
- 3) reinstall insulation,
- 4) remove scaffoldings,