

Omaha Public Power District  
444 South 16th Street Mall  
Omaha, Nebraska 68102-2247  
402/636-2000

February 20, 1996  
LIC-96-0015

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Mail Station P1-137  
Washington, DC 20555

- References:
1. Docket No. 50-285
  2. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, 1989 Edition
  3. ASME Code Case N-533, *Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure-Retaining Bolted Connections, Section XI, Division 1*
  4. ASME Code Case N-498-1, *Alternative Requirements for Ten Year System Hydrostatic Testing for Class 1, 2, and 3 Systems, Section XI, Division 1*
  5. Letter from NRC (T. R. Quay) to OPPD (T. L. Patterson) dated January 30, 1995
  6. Fort Calhoun Station (FCS) Inservice Inspection (ISI) Program Plan for the Third Ten-Year Interval (1993 - 2003), Revision 3, dated September 1, 1995

**SUBJECT: Request for Approval to Implement Provisions of the American Society of Mechanical Engineers (ASME) Code Case N-533**

Pursuant to 10CFR50.55a(a)(3), the Omaha Public Power District (OPPD) requests NRC approval for implementation of the alternate requirements of the ASME Section XI Code Case N-533 at the Fort Calhoun Station (FCS). These requirements would be used in lieu of the requirements stated in Article IWA-5242(a) of Reference 2, regarding the insulation removal for Class 1 pressure-retaining bolted connections in order to perform a VT-2 visual examination required by Subsection IWA-5400. Use of the alternative requirements of Code Case N-533 will result in lower total radiation exposures to personnel and provide significant economic benefits (e.g., reduced outage times, decreased radiation exposure, etc.) without any reduction in the level of quality or safety of the applicable systems/components.

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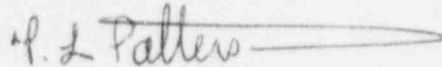
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Please find the attached Discussion and Justification for OPPD's request for exemption from removing insulation from ASME Code Class 1 systems/components for NRC approval. NRC approval to implement ASME Code Case N-533 is requested to allow implementation prior to the 1996 Refueling Outage. Therefore, it is requested that the NRC provide approval prior to August 1, 1996.

If you should have any questions, please contact me.

Sincerely,



T. L. Patterson  
Division Manager  
Nuclear Operations

TLP/d11

Attachment

c: Winston & Strawn  
L. J. Callan, NRC Regional Administrator, Region IV  
L. R. Wharton, NRC Project Manager  
W. C. Walker, NRC Senior Resident Inspector

DISCUSSION AND JUSTIFICATION: CODE CASE N-533

The Fort Calhoun Station (FCS) Inservice Inspection (ISI) Program Plan presently conforms with the system pressure test requirements of Subsections IW8-2500, IWC-2500 and IWD-2500 of the 1989 Edition to the ASME Boiler and Pressure Vessel Code Section XI, *Rules for Inservice Inspection of Nuclear Power Plant Components*, as implemented by ASME Code Case N-498-1 (Reference 4) and approved by the NRC in Reference 5, with the exception of previously docketed relief requests.

For Class 1 systems, ASME Section XI Article IWA-5242(a) for insulated components states, "For systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure retaining bolted connections for visual examination VT-2."

ASME Code Case N-533, *Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure-Retaining Bolted Connections Section XI, Division 1*, was approved by the ASME Code Committee on March 14, 1995. The inquiry to the ASME Code Committee was:

*"What alternative requirements may be used in lieu of those of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination?"*

The ASME Code Committee replied that as an alternative to the requirements of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination, the following requirements shall be met:

- (1) A system pressure test and visual examination shall be performed each refueling outage without removal of insulation.
- (2) Each refueling outage, the insulation shall be removed from the bolted connection and a VT-2 visual examination shall be performed. The connection is not required to be pressurized. Any evidence of leakage shall be evaluated in accordance with IWA-5250.

The Omaha Public Power District (OPPD) requests approval to perform the system leakage and system pressure tests, where applicable, for ASME Code Class 1 systems/piping using the ASME Code Case N-533 alternate requirements stated above, in lieu of the IWA-5242(a) requirements as presently stated in Section XI and the FCS ISI Program Plan, Revision 3.

Use of the Code Case N-533 alternative requirements will reduce the testing duration resulting in lower total radiation exposures to personnel, thus maintaining radiation exposures as low as reasonably achievable (ALARA). Use of ASME Code Case N-533 will also produce significant economic benefits, without any reduction in the level of quality or safety of the applicable systems/components and without reducing public safety.

The NRC's approval to implement ASME Code Case N-533 is requested to allow implementation prior to the 1996 Refueling Outage, which is scheduled to commence on September 21, 1996. Therefore, OPPD requests that the NRC provide approval for implementation of ASME Code Case N-533 prior to August 1, 1996. Upon NRC approval of the proposed alternate testing requirements (ASME Code Case N-533), the FCS ISI Program Plan will be revised to incorporate these testing requirements and to reflect the use of ASME Code Case N-533.