GPU Nuclear, Inc.
U.S. Route #9 South
Post Office Box 388
Forked River, NJ 08731-0388
Tel 609-971-4000

August 19, 1996
6730-96-2259

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

Dear Sir:

Subject: Oyster Creek Nuclear Generating Station
Docket No. 50-219
Request for Relief R15

By letter dated October 25, 1994, the USNRC approved the Inservice Inspection (ISI) Program for the Oyster Creek Nuclear Generating Station. This program was written to meet the 1986 edition of ASME XI, with no addenda.

Pursuant to 10 CFR 50.55(a)(3), this letter is being written to request relief from specific requirements contained in ASME XI, 1986 edition, Section IWA-5250(a)(2). This section of the Code refers to corrective action requirements relating to leakage from bolted connections. The details and justification of this request are contained in Attachment 1.

If any additional information or assistance is required, please contact Mr. John Rogers of my staff at 609.971.4893.

For Michael B. Roche
Vice President and Director
Oyster Creek

MBR/JJR
Attachment

cc: Oyster Creek NRC Project Manager
Administrator, Region I
Senior Resident Inspector

A047 1/1

Attachment I

Relief Request R15

CODE REFERENCE:

ASME Section XI 1986 edition, without addenda.
IWA-5250(a)(2), CORRECTIVE ACTIONS

APPLICABILITY:

Categories B-P, C-H, D-A, D-B, and D-C. Class 1, 2, and 3 Pressure Retaining Components.

CODE REQUIREMENT:

IWA-5250 (a) (2) "if leakage occurs at a bolted connection, the bolting shall be removed as specified, VT-3 visually examined for corrosion, and evaluated in accordance with IWA-3100;".

RELIEF REQUEST:

This relief request is intended to authorize alternatives to the removal of bolting at pressure retaining connections when evidence of leakage is detected during system pressure testing. Relief is requested from compliance with IWA-5250(a)(2), for removal of bolting from leaking bolted connections. GPU Nuclear would implement the alternative of performing corrective measures, as deemed necessary by GPU Nuclear Engineering Staff, to be determined by evaluations.

BASIS FOR RELIEF:

Compliance with the ASME Code requirement for the removal of bolting has resulted in undue hardship to the plant without a compensating increase in the level of quality or safety. Removing a system or subsystem from service or potentially shutting down the plant in order to remove bolting that has not been degraded by leakage is impractical. Experience has shown that equipment can be damaged, personnel exposure can be excessive, and components designed for interference fit make it impossible to remove studs when a bonnet is in place. The existence of a leak does not justify the use of such potentially extreme measures.

There are many other factors that must be considered in order to make a responsible and timely decision. Considerations that are important in assessing leakage through pressure retaining bolted connections include: location of the leak in the plant or system; time in the plant cycle, leaking medium, materials exposed to the leak, Technical Specification limitations, ability to monitor or isolate the leak, and the ability to redirect or capture the leak.

ALTERNATIVE:

The source of all leakage detected shall be located and evaluated by the GPU Nuclear Engineering staff for corrective actions as follows:

The leakage shall be stopped and the bolting and component material reviewed for joint integrity. If the leakage is not stopped, the joint shall be evaluated for joint integrity in accordance with IWA-3100. This evaluation shall consider the number and condition of bolts, leaking medium, bolt and component material, system function, and leakage monitoring.