



Duquesne Light

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May 6, 1985

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Mr. George W. Knighton, Chief
Licensing Branch 3
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2
Docket No. 50-412
Use of ASME III Code Case N-32-3 for Certain Class 3 Piping
Penetrations

Gentlemen:

This letter is to request NRC concurrence to allow utilization of Code Case N-32-3 as guidance for a limited number of ASME Class 3 embedded piping penetrations. The use of this Code Case as guidance allows performance of a hydrostatic maintenance of pressure test without visual inspection of the welds during the test. These penetrations have already been embedded in concrete and they are listed in the attached table.

The 1971 Edition through Winter 1972 Addenda of the ASME III Code is applicable to these penetrations. It states that all joints including welds shall be exposed for examination during hydrostatic testing. However, Code Case N-32-3 states in part:

"For Class 3 embedded piping, radiography is performed on all circumferential butt welds and either magnetic particle or liquid penetrant examinations are performed on all pressure retaining fillet or socket welds.

The hydrostatic test is performed after embedment using maintenance of pressure as the acceptance criteria."

The welds addressed here are fillet welds and are not pressure retaining, and therefore, magnetic particle or liquid penetrant examinations are not required. The performance of a maintenance of pressure test will accordingly result in compliance with Code Case N-32-3.

Code Case N-32-3 was approved for use from May 15, 1978, to May 15, 1981, but it was annulled in July, 1979, as indicated in Regulatory Guide 1.84, Revision 17 (December 1980). Regulatory Guide 1.84, Revision 15 (May 1979), initially identified N-32-3 as an active Code Case.

The later Code Case N-32-4 (included in Regulatory Guide 1.84, Revision 19 through Revision 22) and Paragraph ND-6129 of the Winter 1978

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Addenda of ASME III both delete the modifier "pressure retaining" from fillet or socket weld examination.

Intensive review and evaluation by Duquesne Light Company (DLC) has resulted in the conclusion that the use of Code Case N-32-3 as guidance for these specific penetrations has no effect on safety for the following reasons:

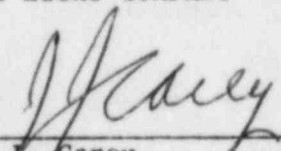
1. The subject welds are attachment welds on the outside of the pressure boundaries. The fillet weld sizes are less than the corresponding pipe wall thickness.
2. The penetration pipes were hydrostatically tested from 950 psi to 2,800 psi prior to welding the attachments.
3. The wall thickness of these penetrations are at least 2.5 times the calculated code minimum wall thickness.
4. The magnetic particle or liquid penetrant examinations of the welds would only detect surface defects on the areas examined.
5. The performance of a maintenance of pressure test is adequate to ensure the safety of these penetrations.

DLC proposes that Code Case N-32-3 be implemented, as guidance, by including the applicable portion of this code case, as quoted in this letter, in the BVPS-2 FSAR, in the related specifications, and in the BVPS-2 ASME Code Baseline Document.

Immediate notification will be given if any other similar cases become known in the future. Your concurrence to allow utilization of Code Case N-32-3 as guidance for these specific penetrations is requested by May 24, 1985.

DUQUESNE LIGHT COMPANY

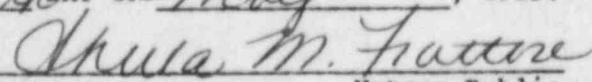
By


J. J. Carey
Vice President

JDO/wjs
Attachment

cc: Mr. B. K. Singh, Project Manager (w/a)
Mr. G. Walton, NRC Resident Inspector (w/a)

SUBSCRIBED AND SWORN TO BEFORE ME THIS
6th DAY OF May, 1985.


Notary Public

SHEILA M. FATTORE, NOTARY PUBLIC
SHIPPINGPORT BORO, BEAVER COUNTY
MY COMMISSION EXPIRES SEPT. 16, 1985
Member, Pennsylvania Association of Notaries

COMMONWEALTH OF PENNSYLVANIA)
) SS:
COUNTY OF BEAVER)

On this 16th day of May, 1985, before me, a
Notary Public in and for said Commonwealth and County, personally appeared
J. J. Carey, who being duly sworn, deposed and said that (1) he is Vice
President of Duquesne Light, (2) he is duly authorized to execute and file
the foregoing Submittal on behalf of said Company, and (3) the statements set
forth in the Submittal are true and correct to the best of his knowledge.

Sheila M. Fattore
Notary Public

SHEILA M. FATTORE, NOTARY PUBLIC
SHIPPINGPORT BORO, BEAVER COUNTY
MY COMMISSION EXPIRES SEPT. 16, 1985
Member, Pennsylvania Association of Notaries

ASME Class 3 Embedded Piping Penetrations Involving
Application of Code Case N-32-3

<u>Penetration/ Anchor No.</u>	<u>Location</u>	<u>Iso. No.</u>	<u>Line No.</u>
P-1373	Auxiliary Building	1019011	2SWS-008-200-3
P-1374	Auxiliary Building	1019012	2SWS-008-201-3
P-1377	Auxiliary Building	1072024	2CCP-018-038-3
P-1378	Auxiliary Building	1072011	2CCP-018-032-3
P-1379	Auxiliary Building	1072010	2CCP-018-029-3
P-1380	Auxiliary Building	1072022	2CCP-018-035-3
A-75	Valve Pit	1207028	2SWS-030-040-3
A-640	Valve Pit	1207027	2SWS-030-041-3
A-585	Valve Pit	1207030	2SWS-006-042-3
A-1065	Valve Pit	1207031	2SWS-006-043-3
A-340	Valve Pit	1207029	2SWS-030-050-3
A-155	Valve Pit	1207013	2SWS-024-062-3
A-930	Valve Pit	1207014	2SWS-024-063-3
A-470	Valve Pit	1207015	2SWS-006-064-3
A-695	Valve Pit	1207005	2SWS-030-081-3
A-5	Valve Pit	1207006	2SWS-030-082-3
A-260	Valve Pit	1207007	2SWS-012-161-3
A-755	Valve Pit	1207008	2SWS-012-162-3
P-20	Intake Structure	CI311-001	30"SWS-14-151-Q3
P-21	Intake Structure	CI311-001	30"SWS-14-151-Q3
P-24	Intake Structure	CI311-002	30"SWS-5-151-Q3
P-25	Intake Structure	CI311-002	30"SWS-5-151-Q3