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CHRIS H. POINDEXTER
VICE PRESIDENT
ENGINEERING AND CONSTRUCTION

May 10, 1985

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D. C. 20555

ATTENTION: Mr. James R. Miller, Chief
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Inservice Inspection Program Request For Relief from ASME Code
Section XI Requirements Determined to be Impractical

Gentlemen:

In accordance with 10 CFR 50.55 a(g)(6)(i), we are requesting an exemption from ASME Code Section XI requirements that have been determined to be impractical. In accordance with the NRC Staff Guidance letter dated November 24, 1976, the information concerning the exemption request is presented herein.

Subsequent to the modification of 3" diameter, Class 1, stainless steel piping for the relocation of pressurizer spray valves, number 1-CV-100E and 1-CV-100F, four welds were inaccessible for proper radiographic examination per Code requirements. An acceptable radiographic examination of the four pipe-to-pipe welds is impossible due to the angle and distance of the radiographic beam required to clear interferences around the pipe. The Commission is requested to exempt the requirements for performing a radiographic examination in this particular case.

The attached isometric sketches provide a detailed description of the location of the four welds.

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A tabulation of the information required for this request is presented below:

I. COMPONENT FOR WHICH RELIEF IS REQUESTED

A. Name and Number

Piping line numbers 3"-CC-11-1001 and 3"-CC-11-1002 are the inlet piping lines to 1-CV-100E and 1-CV-100F respectively, from the Reactor Coolant System (RCS) cold legs. These lines are shown as 3"-CC-11-1001 and 3"-CC-11-1002 in Figure 4-1 (E-8) of the Updated Final Safety Analysis Report. The subject welds are identified in the Inservice Inspection Program as numbers 1001M-21, 1002M-25, 1001-15A, and 1002M-19A (see Attachments)

B. Function

The primary function of these lines is to provide relatively cool reactor coolant water to the pressurizer spray header to control pressurizer pressure under normal operations. The modification that resulted in the inaccessible welds relocated the spray valves 1-CV-100E and 1-CV-100F to the roof of the pressurizer enclosure. This modification will allow Operations and Maintenance personnel to adjust actuators, inspect and work on these valves outside of the pressurizer enclosure environment.

C. Code Class

Regulatory Guide 1.26: Class 1
Original Design: B.31.7 Class 1

II. CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED

The modification was performed in accordance with ASME Code Section XI 1974 Edition with Addenda through Summer 1975. As required by ASME Code Section XI IWA-4100(c), the modification was performed in accordance with the Code applicable to the construction of the system. USA Standard B31.7-1969 with 1970 Addenda has been adhered to with the exception of a radiographic examination meeting Code sensitivity requirements on the four welds, 1001M-21, 1002M-25, 1001M-15A, and 1002M-19A, for which relief is requested.

III. SUPPORTING INFORMATION

An acceptable radiographic examination of the four welds is impossible due to the angle and distance of radiographic beam required to clear interferences such as other pipes and supports in the vicinity.

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IV. IN LIEU OF TESTING

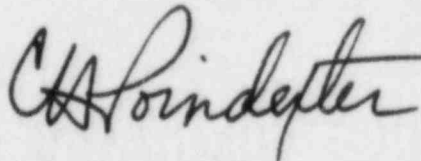
The following non-destructive examinations will be performed in lieu of the radiograph:

- A. Ultrasonic Examination
- B. Liquid Penetrant Examination
- C. Radiographic Examination of Root Pass (Non-code Requirement)
- D. Best Possible Radiographic Examination of Final Pass
- E. Hydrostatic Pressure Testing in accordance with ASME Code Section XI

We have determined that this request constitutes an amendment for Calvert Cliffs Unit No. 1, pursuant to 10 CFR 170.21. Accordingly, Baltimore Gas & Electric will forward a check under separate cover in the amount of \$150.00.

Should you have further questions regarding this matter, please do not hesitate to contact us.

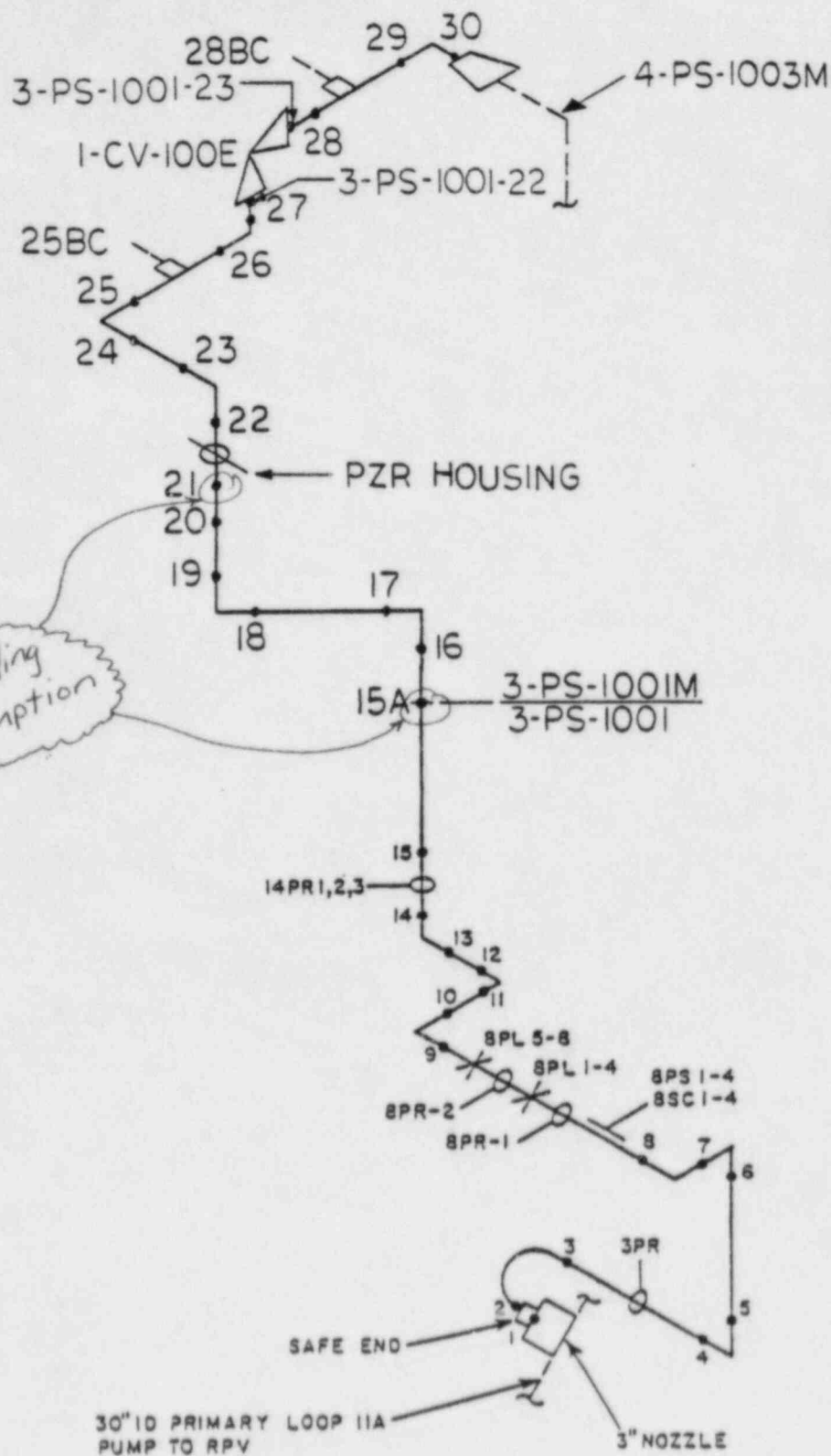
Very truly yours,



AEL/MSK/BCR/MTF/sjb

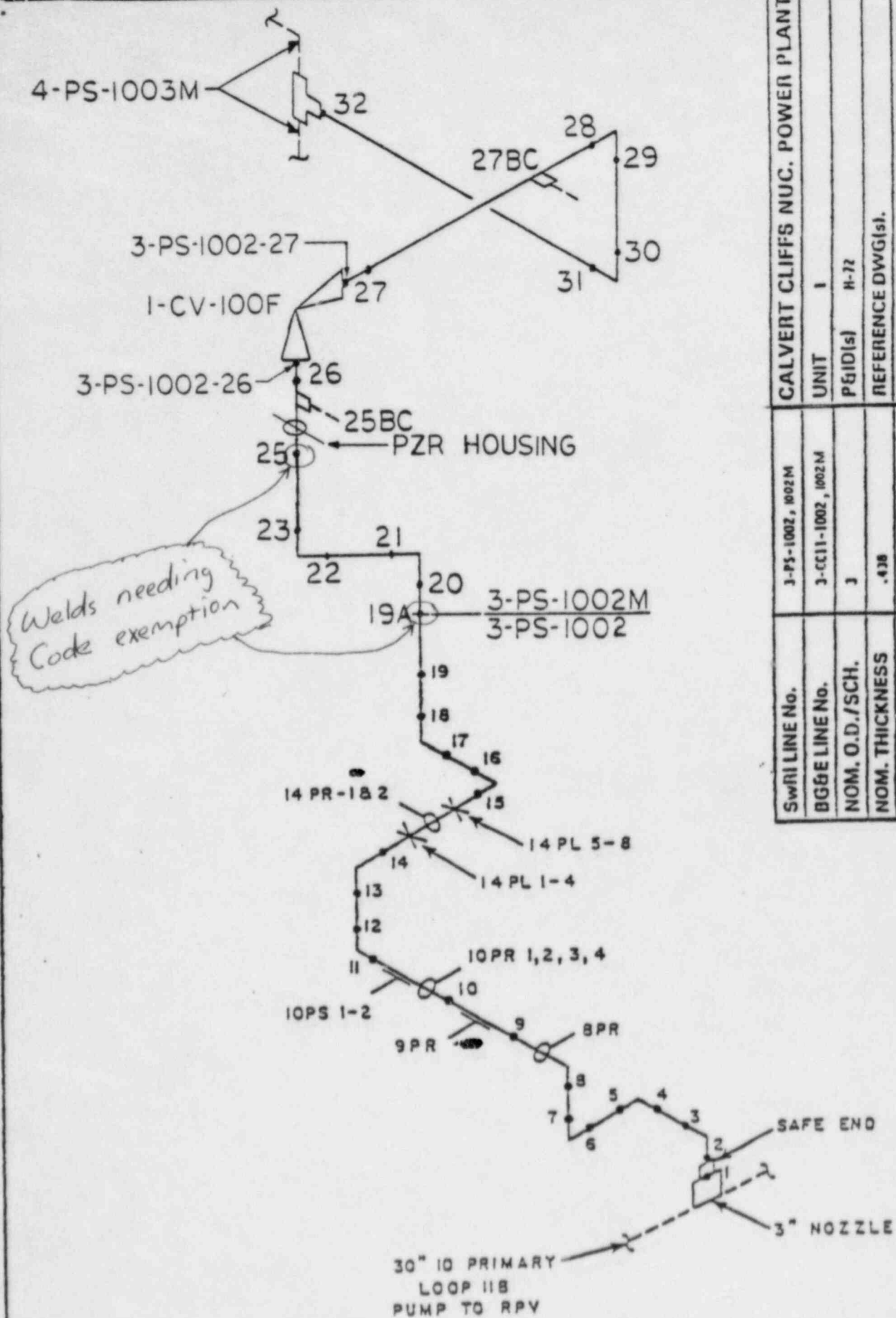
Attachments

cc: D. A. Brune, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
T. Foley, NRC
T. Magette, DNR



CALVERT CLIFFS NUC. POWER PLANT				
UNIT	1			
P&ID(s)	M-72			
REFERENCE DWG(s)				
FIGURE	A-31			
REV.	3	5-9-85		

SwRI LINE No.	3-PS-1001, 1001M
BGE LINE No.	3-CC11-1001, 1001M
NOM. O.D./SCH.	3
NOM. THICKNESS	.438
MATERIAL	SS
CAL. BLK.	CC-14



SWRI LINE No.	3-PS-1002, 1002M	CALVERT CLIFFS NUC. POWER PLANT
DS&E LINE No.	3-CC11-1002, 1002M	UNIT 1
NOM. O.D./SCH.	3	P&ID(s) H-72
NOM. THICKNESS	.438	REFERENCE DWG(s).
MATERIAL	SS	FIGURE A-32
CAL. BLK.	CC-14	REV. 3 5-9-85