Docket No.: STN 50-454

AUG 3 0 1985

Mr. Dennis L. Farrar
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Farrar:

Subject: Emergency Relief Request Safety Injection System Class 2 Welds - Byron Station, Unit 1

By letter dated August 29, 1985, Commonwealth Edison Company requested an emergency relief from Section 11 of the ASME Code concerning preservice inspection requirements. Relief was requested from performing the required volumetric and surface examinations for two Class 2 circumferential welds in the Safety Injection System (weld number C-1; line numbers 1SI06BA-24" and 1SI06BB-24").

The evaluation and justification provided in your submittal has been reviewed and found acceptable. This letter confirms the verbal granting of a temporary waiver of compliance with the ASME Code preservice inspection requirements which was given at 9:00 p.m. on August 29, 1985. This waiver of compliance is in effect until 9:00 p.m. on September 3, 1985, by which time the NRC will complete the processing of your emergency relief request.

Sincerely,

ORIGINAL SIGNED BY:

Thomas M. Novak, Assistant Director
for Licensing
Division of Licensing

Enclosure:
CECo Emergency Relief Request

cc: See next page

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8/29/85

To: Jan Stevens NRC

Byron Unit 1

Relief Request ____, Examination Category C-F, Class 2 Welds in the Safety Injection Systems

Line Number	Weld Number
1 SI06BA-24"	C-1
1 SI06BB-24"	C-1

Code Requirements: The subject Class 2 circumferential welds at structural discontinuities require volumetric and surface examinations in accordance with TABLE IWC-2500-1 (Category C-F) Items C5.21.

Code Relief Request: Relief is requested from performing the required volumetric and surface examination on inaccessible welds.

Reason for Request: The above listed welds are inaccessible for volumetric and surface examinations due to the location of the valve containment assemblies covering the pressure retaining pipe welds. The welds were to be examined per Code requirements as part of the preservice inspection program. However, the Applicant inadvertently performed the required examination with acceptable results on the non-pressure-retaining weld between the closure plate of containment assembly and the pipe. Examination of the pressure retaining weld requires removal of the valve containment assembly without a significant increase in the level of safety. The Applicant will commit to performing volumetric and surface examinations on the pressure-retaining pipe weld upon the initial removal of the valve containment assemblies.

Justification:

1. The pressure-retaining pipe circumferential welds received radiographic volumetric examination in accordance with ASME Code Section III, Class 2 requirements during fabrication.

2. The required Section XI examinations are impossible without removal the valve containment assemblies. Removal of the containment assemblies would result in hardship or unusual difficulties including plant shutdown without a compensating increase in the level of quality and safety since the radiography performed during construction on the pipe welds verify the preservice structural integrity.

3. Leakage from the valve containment assemblies is continually monitored by a leak detection device measuring water level inside the assemblies. High water level is annunciated in the main control room assuring prompt operator action in the event of an abnormal condition. Leakage from the assemblies is piped to the Auxiliary Building floor drain sump to avoid leakage to the plant environment.

4. During normal plant operation the subject safety injection lines are not required to operate or perform a safety function but remains flooded under static conditions.

K. A. Ainger

K. A. Ainger
Commonwealth Edison

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