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W. JAMES LIPPOLD
MANAGER

NUCLEAR ENGINEERING SERVICES DEPARTMENT

March 14, 1988

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Request for Permission to Use ASME Boiler and Pressure Vessel Code
Case N-416

REFERENCES: (a) Letter from Mr. W. J. Lippold (BG&E) to NRC Document Control Desk,
dated February 24, 1988, same subject

(b) Regulatory Guide 1.147, Inservice Inspection Code Case
Acceptability, ASME Section XI, Division 1, Revision 5,
August 1986

(c) Updated Final Safety Analysis Report, Calvert Cliffs Nuclear Power
Plant, Unit Nos. 1 and 2, Section 4.1.3.2, Steam Generator

Gentlemen:

This letter supplements the previous request in Reference (a). As allowed by 10 CFR 50.55a, we are requesting permission to use the attached Code Case N-416 without exception. Code Case N-416 is listed in the current revision of Regulatory Guide 1.147 (Reference b) as being generally acceptable to the NRC with no limitations. Footnote 6 to 10 CFR 50.55a permits the use of code cases upon authorization by the Director of the Office of Nuclear Reactor Regulation.

This code case will be applied in the repair or replacement of two 16-inch check valves (2FW-130 and 2FW-133) in the Unit 2 Main Feedwater System (ISI Class 2). These valves are located in the containment building. After one valve had failed ASME Section XI testing on February 27, 1988, the valve 2FW-130 was disassembled and examined on March 11, 1988. The cast carbon steel valve material under the stellite seat was found to be eroded and washed out. A subsequent inspection of 2FW-133 found the valve to be in the same condition. Both valves are being removed for repair and replacement.

The IWA-4400 requirement to perform a hydrostatic test is impractical because the valves cannot be isolated from the Steam Generators and hydrostatic testing would result in cycling of the Steam Generators. Design limitations on cycling the Steam Generators at hydrostatic pressure are contained in Reference (c).

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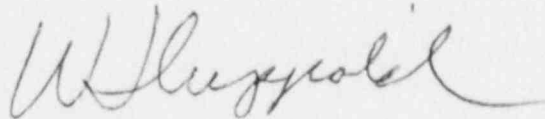
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In order to ensure a high level of quality and safety, a system functional (visual) test and a radiographic examination of the full penetration welds will be performed in lieu of a hydrostatic test. In addition, surface and pre-service ultrasonic examinations will be performed. These will be done in accordance with IWA-4000, IWA-7000, and Code Case N-416. A hydrostatic test will be performed at the next regularly scheduled system hydrostatic test.

Permission to apply Code Case N-416 is requested by March 21, 1988. The problem with the two valves in question could not reasonably have been anticipated.

Should you have any questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,

A handwritten signature in dark ink, appearing to read "W. J. L. Russell", written in a cursive style.

WJL/SRC/dlm

cc: D. A. Brune, Esquire
J. E. Silberg, Esquire
R. A. Capra, NRC
S. A. McNeil, NRC
W. T. Russell, NRC
D. C. Trimble, NRC