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U. S. Nuclear Regulatory Commission
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Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 1
DOCKET NO. 50-445
RELIEF REQUEST TO THE CPSES INSERVICE INSPECTION PROGRAM
(1986 EDITION OF ASME CODE, SECTION XI, NO ADDENDA; UNIT 1 INTERVAL DATES: AUGUST 13, 1990 - AUGUST 13, 2000, FIRST INTERVAL)

REF: TXU Letter logged TXX- 00053 dated February 29, 2000, from C. L. Terry to the NRC.

Via the referenced letter TXU Electric requested approval to utilize Code Case N-498-2 "Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems Section XI, Division 1." However, as a result of further discussions with your staff, it was deemed appropriate to request a relief request from the Code.

This transmittal submits Unit 1 Relief Request A-4 (Attachment 1) for your approval. TXU Electric requests approval for Relief Request A-4 by July 31, 1999.

A047 1/1

There are no new licensing based commitments in the communication. Should you have additional questions, please contact Obaid Bhatty at 254-897-5839.

Sincerely,

C. L. Terry

By: Roger D. Walker
Roger D. Walker
Regulatory Affairs Manager

OAB/oab

Attachment

cc: E. W. Merschoff, Region IV
J. I. Tapia, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES
G. Bynog, TDLR

CPSES UNIT 1
RELIEF REQUEST
A-4

A. Item(s) for which relief is requested:

Safety Injection System - Hot leg and cold leg injection paths to the nonisloable ASME Safety Class 1 main loop piping.

B. Item(s) Code Class:

1, 2

C. Examination requirement from which relief is requested:

The hold time requirements of Code Case N-498-1 "Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems Section XI, Division 1". Code Case N-498-1 is an approved alternative to ASME Section XI 1986 Edition, no Addenda, per Regulatory Guide 1.147 "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1"

D. Basis for relief:

CPSES has invoked Code Case N-498-1 for Class 1, 2 and 3 systems as permitted by Regulatory Guide 1.147.

The ASME Section XI system pressure test for the safety injection hot leg and cold leg injection paths to the nonisloable ASME Safety Class 1 main loop piping is performed in conjunction with the emergency core cooling system (ECCS) check valve forward flow functional testing. This ECCS check valve forward flow functional test is performed periodically during refueling outages by putting the plant in various non standard operating system lineups. For each of these lineups water is transferred from the reactor water storage tank (RWST) through the safety injection system and eventually into the reactor vessel and the reactor refueling cavity. Limits exist for low RWST level and high refueling cavity level and this test can only be run in segments during reactor cavity fill sequences. In order to maintain these water level limits and to complete all of the injection path segments, the duration for each of the injection path functional tests is shorter than the hold time required by N-498-1. The duration of the ECCS check valve

forward flow functional test varies by test segment. This duration is sufficient to adequately

verify a systems readiness to perform its safety function.

The safety injection system piping is water solid in its normal standby condition. Head pressures are present and vary throughout the system. The portions of the system located outside of containment are typically insulated for moderate energy line break shielding purposes while the portions located inside containment are not insulated. The safety injection pump suction and discharge piping are in the areas outside of containment and are subject to periodic operator walkdowns and ASME Section XI Inservice Test (IST) pump runs during plant operation. The piping segments inside containment are located in refueling outage high traffic areas and are examined by VT-2 qualified examiners before, during and after the system functional testing. Site procedures require that any leakage identified by these activities be documented and evaluated for system operability. There is reasonable assurance that any leakage from the insulated portions of the system located outside of containment or from the uninsulated segments located inside containment would be identified.

Compliance with the hold times required by N-498-1 would result in increased personnel radiation exposures, additional unscheduled reactor cavity fills and drains and unnecessary challenges to the ability of the hot leg and cold leg injection flow path systems and components to perform their safety related function. These hardships would be incurred without a compensating increase in the level of quality and safety.

E. Alternate examinations:

Perform VT-2 examination of those portions of the hot leg and cold leg injection paths that are outside of containment and within the safety injection pump test boundary once per period in conjunction with an IST safety injection pump test.

F. Anticipated impact on the overall level of plant quality and safety:

None.