

June 29, 2000

Mr. C. Lance Terry  
TXU Electric  
Senior Vice President & Principal Nuclear Officer  
Attn: Regulatory Affairs Department  
P. O. Box 1002  
Glen Rose, TX 76043

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1, RE: SECOND  
INTERVAL REQUEST FOR RELIEF FROM THE REQUIREMENTS OF THE  
AMERICAN SOCIETY OF MECHANICAL ENGINEERS CODE CONCERNING  
DELAY OF CODE UPDATE (TAC NO. MA8310)

Dear Mr. Terry:

By letter dated February 24, 2000, TXU Electric (the licensee) requested relief from the requirements of the American Society of Mechanical Engineers (ASME) Code for the second 10-year inservice inspection (ISI) interval for the Comanche Peak Steam Electric Station (CPSES), Unit 1. The licensee requested approval to delay updating the ISI program to the applicable code edition for CPSES, Unit 1, until the time of the required update of the ISI program for Unit 2 for the second 10-year ISI interval. After the start of the second 10-year interval for CPSES, Unit 2, both CPSES units would utilize the same edition of the ASME Code.

The NRC staff's safety evaluation is enclosed. The request was reviewed against the requirements of 10 CFR 50.55a(a)(3)(i) and the ASME Code, Section XI, for Class 1, 2, and 3 components. The NRC staff has determined that the licensee's proposed alternative to delay updating the ISI program to the applicable edition of the ASME Code for CPSES, Unit 1, until the time of the required update for Unit 2, provides an acceptable level of quality and safety and is, therefore, authorized pursuant to 10 CFR 50.55a(a)(3)(i). This authorization does not apply to the expedited examination of containment requirements stated in 10 CFR 50.55a(g)(6)(ii)(B).

Sincerely,

*/RA/*

David H. Jaffe, Senior Project Manager, Section 1  
Project Directorate IV & Decommissioning  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-445

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SECOND 10-YEAR INTERVAL INSERVICE INSPECTION

REQUEST FOR RELIEF

TXU ELECTRIC

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1

DOCKET NO. 50-445

1.0 INTRODUCTION

Inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (ASME Code) and applicable addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The current Code of Record for Comanche Peak Steam Electric Station (CPSES), Unit 1, is the ASME Code, Section XI, 1986 Edition, no Addenda.

By letter dated February 24, 2000 (Log # TXX-00041), TXU Electric (the licensee), requested approval to delay updating the ISI program to the applicable code edition for CPSES, Unit 1, until the time of the required update of the ISI program for CPSES, Unit 2, for the second 10-year ISI interval. After the start of the second 10-year interval for CPSES, Unit 2, both CPSES units would utilize the same edition of the Code. The NRC staff reviewed and evaluated the licensee's request pursuant to 10 CFR 50.55a(a)(3)(i).

## 2.0 EVALUATION

The information provided by the licensee in support of the proposed alternative contained in the letter dated February 24, 2000, has been evaluated, and the bases for disposition are documented below.

### 2.1 Code Requirement

For CPSES, Unit 1, the applicable edition of Section XI of the ASME Code for the first 10-year ISI interval, which ends in August 2000, is the 1986 edition. Pursuant to 10 CFR 50.55a(g)(4)(ii), CPSES, Unit 1, is required to update its ISI program to the requirements of the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) 12 months prior to the start of its subsequent 120-month inspection interval. In the case of CPSES, Unit 1, the applicable edition of the code to which its second 10-year ISI program should reflect, is the 1989 edition.

### 2.2 Licensee's Proposed Alternative Examination (as stated)

"...TXU Electric requests an approval to delay the update of the Code of Record [ASME Section XI, 1986 Edition, no Addenda] for the Unit 1 Inservice Inspection (ISI) Program until the time of the required update for Unit 2. The second 10-year ISI interval for Unit 1 starts in August 2000. The Code update for the second Unit 2 interval is scheduled for 2003."

### 2.3 Licensee's Basis for Relief Request (as stated)

"CPSES will continue with Unit 1 ISI inspections as described below; and will implement the ASME Section XI Appendix VIII requirements in accordance with 10 CFR 50.55a, and will be subject to any additional ISI related requirements that may be mandated by subsequent NRC rulemaking. Having both units on the same Code of Record provides many implementation benefits which will maintain the existing level of quality and safety and provides cohesive programs for ISI, Repairs/Replacements and Pressure Testing. Having two separate ASME Code years implemented on a two-unit site can create procedural and programmatic differences that could potentially result in implementation errors."

"The Unit 1 ISI inspections will continue with a revised 10-year Program Plan for the second interval that references the same Code of Record used for the first interval, that is, ASME Section XI, 1986 Edition, no Addenda. All required piping and components will be selected, scheduled and examined in accordance with these Code requirements. At the time of the required Unit 2 Code update, the Unit 1 Plan will be revised to implement the updated Code of Record for the remainder of the Unit 1 second inspection interval, which is expected to include the second and third inspection periods in their entirety (approximately 7 years)."

### 2.4 Staff Evaluation

The NRC staff has reviewed the proposed alternative submitted in the licensee's letter dated February 24, 2000, for the second 10-year ISI interval for CPSES, Unit 1. The intent of the licensee's request is to have the ISI programs for both units based on the same Code of Record. According to the licensee, the Code update for Unit 1 is due in August 2000, and for Unit 2 in August 2003. The licensee proposed that Unit 1 will continue ISI inspections in

accordance with the current 1986 code edition program plan until the time of the required Unit 2 update, at which time both units will be updated to the applicable code edition as required by 10 CFR 50.55a.

Based on the information provided in the licensee's submittal, dated February 24, 2000, the NRC staff concurs that having two ISI programs based on separate editions of ASME Code, Section XI implemented for the two CPSES units can possibly create procedural and programmatic differences that could potentially result in implementation errors. Conversely, having both units' ISI programs based on the same code edition can eliminate such differences and should provide for more cohesive programs for ISI, repairs, replacements, and pressure testing.

The licensee has indicated that during the interim prior to the required code update of CPSES, Unit 2, CPSES, Unit 1, will continue with its ISI in accordance with the requirements of the code edition of the first interval, will implement the requirements of Appendix VIII of the ASME Code, Section XI, and will be subject to any additional ISI related requirements that may be mandated by subsequent rulemaking.

On the bases stated above, the NRC staff has determined that the licensee's proposed alternative to delay updating the ISI program to the applicable edition of the ASME Code for CPSES, Unit 1, until the time of the required update for CPSES, Unit 2, provides an acceptable level of quality and safety and is, therefore, authorized pursuant to 10 CFR 50.55a(a)(3)(i). This authorization does not apply to the expedited examination of containment requirements stated in 10 CFR 50.55a(g)(6)(ii)(B).

Principal Contributor: S. Hou

Date: June 29, 2000

Comanche Peak Steam Electric Station

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