

**TXU Electric**  
**Comanche Peak**  
**Steam Electric Station**  
P.O. Box 1002  
Glen Rose, TX 76043  
Tel: 254 897 8920  
Fax: 254 897 6652  
lterry1@txu.com

**C. Lance Terry**  
Senior Vice President & Principal Nuclear Officer

Ref. # 10CFR50.55a(a)(3)(i)

CPSES-200001591  
Log # TXX-00104  
File # 10010.1  
905.2 (clo), 906.6 (clo)

June 29, 2000

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)**  
**DOCKET NOS. 50-445 AND 50-446**  
**REQUEST TO INVOKE CODE CASE N-573**  
**ISI RELIEF REQUESTS A3 FOR UNIT 1 AND A3 FOR UNIT 2**

**APPLICABLE CODE: 1986 EDITION OF ASME CODE, SECTION XI, NO**  
**ADDENDA;**  
**UNIT 1 INTERVAL: DATES: AUGUST 13, 1990 - AUGUST 13, 2000, FIRST**  
**INTERVAL;**  
**UNIT 2 INTERVAL: DATES: AUGUST 3, 1993 - AUGUST 3, 2003, FIRST**  
**INTERVAL**

Gentlemen:

Via this letter TXU Electric requests approval to utilize Code Case N-573, "Transfer of Procedure Qualification Records Between Owners."

Pursuant to 10CFR50.55a(a)(3)(i), relief is requested from the requirements for welding and brazing procedure qualifications as stated in ASME, Section XI, IWA-4000. This request also includes relief for all Procedure Qualification Records (PQRs) supporting alternative repair procedures in accordance with ASME, Section XI, IWA-4300.

TXU Electric requests to utilize ASME Code Case N-573 as an alternative method to qualify welding procedures during the second interval for Unit 1, and first interval for Unit 2. TXU Electric requests approval by October 2000.

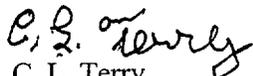
Refer to Attachment 1 and Attachment 2 for additional details. Please note that the Pilgrim Nuclear Power Station (submitted by letter dated March 17, 1999 and approved by NRC letter dated June 28, 1999) and Brunswick Steam Electric Plant (submitted by letter dated September 14, 1999 and approved by NRC letter dated February 17, 2000) have received such a relief.

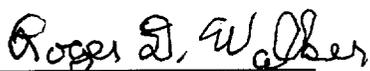
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TXX-00104  
Page 2 of 2

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

Sincerely,

  
C. L. Terry

By:   
Roger D. Walker  
Regulatory Affairs Manager

OAB/ob

Attachments

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

## **RELIEF REQUEST A3 UNIT 1**

### **SYSTEM/COMPONENT(S) FOR WHICH ALTERNATE EXAMINATION WILL BE USED**

Code Classes: 1, 2, and 3  
References: ASME, Section XI, IWA-4300 (1986 Edition)  
ASME Code Case N-573  
Examination Category: All  
Item Number: All  
Description: Use of Code Case N-573  
Component Numbers: All

### **CODE REQUIREMENT**

ASME, Section XI, IWA-4300, 1986 edition with no addenda requires that the Owner must qualify all welding procedures.

### **BASIS FOR ALTERNATE EXAMINATION**

Pursuant to 10CFR50.55a(a)(3)(i), relief is requested from the requirements for welding and brazing procedure qualifications as stated in ASME, Section XI, IWA-4300.

TXU Electric requests to utilize ASME Code Case N-573 as an alternative method to qualify welding procedures.

Maintaining the original requirement presents an undue hardship, as considerable utility specific resources would be duplicated when qualified procedures from other NRC licensed facilities have already been demonstrated to provide an acceptable level of quality and safety. The requested alternative will not reduce safety or quality.

### **ALTERNATE EXAMINATION**

1. TXU Electric will use Code Case N-573 to allow the use of other Owner's Procedure Qualification Records (PQRs). Steps to be taken by TXU Electric to ensure the technical correctness of other Owner's PQRs and to ensure the resulting Welding Procedure Specifications (WPSs) produce sound welds are as follows.
2. TXU Electric will perform a technical review of the supplying Owner's PQR. The supplying Owner will state in writing that the PQR was performed under an approved Nuclear Quality Assurance program that meets ASME, Section XI, IWA-1400 and that it was performed in accordance with ASME, Section IX.
3. TXU Electric will generate a WPS using the variables established in the supplied PQRs. TXU Electric PQRs may supplement the other Owner's supplied PQRs. All essential variables of the most recent ASME, Section IX, shall be addressed in the generated WPS.
4. The generated WPS will be reviewed and approved in accordance with TXU Electric's Quality Assurance Program.

**RELIEF REQUEST A3 UNIT 1 (contd.)**

5. TXU Electric will demonstrate the generated WPS by successfully passing a performance qualification test in accordance with ASME, Section IX.
6. TXU Electric will not transfer a supplied PQR to any other Owner.
7. TXU Electric will document the use of Code Case N-573 on the appropriate NIS-2 form.

**APPLICABLE TIME PERIOD**

Alternative is requested for the second ten-year interval (August 13, 2000, to August 13, 2010) of the Inservice Inspection Program for TXU Electric, Unit 1.

## RELIEF REQUEST A3 UNIT 2

### SYSTEM/COMPONENT(S) FOR WHICH ALTERNATE EXAMINATION WILL BE USED

Code Classes: 1, 2, and 3  
References: ASME, Section XI, IWA-4300 (1986 Edition)  
ASME Code Case N-573  
Examination Category: All  
Item Number: All  
Description: Use of Code Case N-573  
Component Numbers: All

### CODE REQUIREMENT

ASME, Section XI, IWA-4300, 1986 edition with no addenda requires that the Owner must qualify all welding procedures.

### BASIS FOR ALTERNATE EXAMINATION

Pursuant to 10CFR50.55a(a)(3)(i), relief is requested from the requirements for welding and brazing procedure qualifications as stated in ASME, Section XI, IWA-4300 and balance of plant welding.

TXU Electric requests to utilize ASME Code Case N-573 as an alternative method to qualify welding procedures.

Maintaining the original requirement presents an undue hardship, as considerable utility specific resources would be duplicated when qualified procedures from other NRC licensed facilities have already been demonstrated to provide an acceptable level of quality and safety. The requested alternative will not reduce safety or quality.

### ALTERNATE EXAMINATION

1. TXU Electric will use Code Case N-573 to allow the use of other Owner's Procedure Qualification Records (PQRs). Steps to be taken by TXU Electric to ensure the technical correctness of other Owner's PQRs and to ensure the resulting Welding Procedure Specifications (WPSs) produce sound welds are as follows.
2. TXU Electric will perform a technical review of the supplying Owner's PQR. The supplying Owner will state in writing that the PQR was performed under an approved Nuclear Quality Assurance program that meets ASME, Section XI, IWA-1400 and that it was performed in accordance with ASME, Section IX.
3. TXU Electric will generate a WPS using the variables established in the supplied PQRs. TXU Electric PQRs may supplement the other Owner's supplied PQRs. All essential variables of the most recent ASME, Section IX, shall be addressed in the generated WPS.
4. The generated WPS will be reviewed and approved in accordance with TXU Electric's Quality Assurance Program.

**RELIEF REQUEST A3 UNIT 2 (contd.)**

5. TXU Electric will demonstrate the generated WPS by successfully passing a performance qualification test in accordance with ASME, Section IX.
6. TXU Electric will not transfer a supplied PQR to any other Owner.
7. TXU Electric will document the use of Code Case N-573 on the appropriate NIS-2 form.

**APPLICABLE TIME PERIOD**

Alternative is requested for the first ten-year interval (August 3, 1993, to August 3, 2003) of the Inservice Inspection Program for TXU Electric, Unit 2.