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

CPSES-200101417
Log # TXX-01090
File # 10010.1
905.2 (clo), 906.6 (clo)

June 19, 2001

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-528-1

APPLICABLE CODE: COMANCHE PEAK STEAM ELECTRIC STATION
(CPSES) DOCKET NOS. 50-445 AND 50-446
RELIEF REQUESTS A-1 FOR UNIT 1 AND A-3 FOR
UNIT 2

APPLICABLE CODE: 1986 EDITION OF ASME CODE, SECTION XI, NO
ADDENDA;

UNIT 1 INTERVAL: DATES: AUGUST 13, 2000 - AUGUST 13, 2010, SECOND
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-528-1,
"Purchase, Exchange, or Transfer of Material Between Nuclear Plant Sites."

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the Administrative
requirements of Section III of the American Society of Mechanical Engineers
(ASME) Boiler and Pressure Vessel Code imposed by IWA-7210 of ASME Section
XI 1986 edition, no addenda.

TXU Electric requests to utilize ASME Code Case N-528-1 as an alternative method
to purchase, exchange, or transfer material with other nuclear sites. The proposed
alternative is described in Attachment 1, which provides an acceptable level of quality
and safety as required by 10 CFR 50.55a(a)(3)(i). Attachment 2 is a copy of the code
case. TXU Electric requests approval by October 2001.

A047

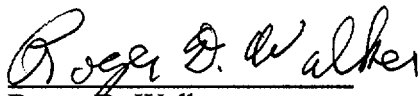
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Please note that the Southern Nuclear Operating Company has submitted relief requests during 1999 and 2000 to the NRC to use a similar Code Case, N-528, at the Edwin I. Hatch Nuclear Plant and at the Vogtle Electric Generating Plant. The NRC approved the use of Code Case N-528 for use at the Edwin I. Hatch Nuclear Plant on March 20, 2000.

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
D. N. Graves, Region IV
D. H. Jaffe, NRR
Resident Inspectors, CPSES
G. Bynog, TDLR

**RELIEF REQUEST A-1 UNIT 1
REQUEST FOR RELIEF TO USE ASME CODE CASE N-528-1**

SYSTEM/COMPONENT(S) FOR WHICH ALTERNATE EXAMINATION WILL BE USE:

This request for relief proposes an alternative to the administrative requirements of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Section III imposed by IWA-7210 in the 1986 Edition, no Addenda of the Section XI of the ASME Code Section XI when material meeting the definition in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites.

ASME CODE REQUIREMENT:

IWA-7210 in 1986 Edition, no Addenda of ASME Section XI contains the requirement for the Code applicability of replacement items. IWA-7000 provides the rules and requirements for the specification and construction of items to be used for replacement. Replacement includes the addition of components and system changes. IWA-7210 requires that an item to be used for replacement meets the original Construction Code (i.e., Section III of the Code) and existing design requirements. NCA-3000 of Section III of the Code defines the responsibilities of N Certificate Holders. NCA-3700 defines the responsibilities of holders of Certificates of Authorization, which is generally the organization which performs the activities to place and attach components to their support structures. The responsibilities of N Certificate Holders include surveying, qualifying, and auditing suppliers of subcontracted services, including material suppliers and material manufacturers. When material suppliers or material manufacturers hold a Quality System Certificate (Materials), as defined in NCA-3800, the Certificate Holder does not need to survey or audit the supplier for work within the scope of the Quality System Certificate.

CODE REQUIREMENTS FOR WHICH THE RELIEF IS REQUESTED:

Relief is requested from the requirements of IWA-7210 in 1986 Edition no Addenda ASME Section XI, and as an alternative, it is proposed that Code Case N-528-1 be utilized. A copy of Code Case N-528-1 is included for information.

BASIS FOR RELIEF:

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the requirements of IWA-7210. Code Case N-528-1 applies to metallic material meeting the definition of IWA-9000 that is purchased, exchanged, or transferred between nuclear plant sites. Code Case N-528-1 provides an alternative to the specific administrative requirements of ASME Section III that refer to possession of a Certificate of Authorization or Quality System Certificate (Materials). The case was approved by the ASME Boiler and Pressure Vessel Committee on May 7, 1999.

Code Case N-528-1 provides an alternative to the requirements of NCA-3700/NCA-3800 in that the responsibilities of the N Certificate Holders are, in fact, imposed on the supplying plant. All documentation required by NCA-3700/NCA-3800 is provided to the receiving plant with the material.

**RELIEF REQUEST A-1 UNIT 1(Contd.)
REQUEST FOR RELIEF TO USE ASME CODE CASE N-528-1**

Code Case N-528-1 provides an alternative to the administrative requirements of ASME Section III imposed by IWA-7210. TXU Electric has reviewed Code Case N-528-1 and has determined that its implementation will substantially reduce nonbeneficial work activities required by IWA-7210.

The ASME Boiler and Pressure Vessel Code Committee evaluated the proposed alternatives contained in Code Case N-528-1 and determined that they are acceptable for replacement activities involving material meeting the definition in IWA-9000. The implementation of Code Case N-528-1 will not affect the level of quality and safety nor decrease the margin of public health and safety. The implementation of Code Case N-528-1 is consistent with the intent to eliminate nonbeneficial work activities and their associated costs. Therefore, it is requested that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).

ALTERNATE EXAMINATION:

TXU Electric will comply with the requirements of Code Case N-528-1 in lieu of the requirements of IWA-7210. As required by Code Case N-528-1, TXU Electric will perform an evaluation of material which has been fabricated in accordance with specific dimensional requirements in accordance with IWA-7220 to determine its suitability for use in its intended application, including any differences that might affect form, fit, or function.

APPLICABLE TIME PERIOD

Alternative is requested for the date of approval by the NRC for the operating life of the plant.

**RELIEF REQUEST A-2 UNIT 2
REQUEST FOR RELIEF TO USE ASME CODE CASE N-528-1**

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

This request for relief proposes an alternative to the administrative requirements of American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Section III imposed by IWA-7210 in the 1986 Edition, no Addenda of the Section XI of the ASME Code Section XI when material meeting the definition in IWA-9000 is purchased, exchanged, or transferred between nuclear plant sites.

ASME CODE REQUIREMENT:

IWA-7210 in 1986 Edition, no Addenda of ASME Section XI contains the requirement for the Code applicability of replacement items. IWA-7000 provides the rules and requirements for the specification and construction of items to be used for replacement. Replacement includes the addition of components and system changes. IWA-7210 requires that an item to be used for replacement meets the original Construction Code (i.e., Section III of the Code) and existing design requirements. NCA-3000 of Section III of the Code defines the responsibilities of N Certificate Holders. NCA-3700 defines the responsibilities of holders of Certificates of Authorization, which is generally the organization which performs the activities to place and attach components to their support structures. The responsibilities of N Certificate Holders include surveying, qualifying, and auditing suppliers of subcontracted services, including material suppliers and material manufacturers. When material suppliers or material manufacturers hold a Quality System Certificate (Materials), as defined in NCA-3800, the Certificate Holder does not need to surveyor audit the supplier for work within the scope of the Quality System Certificate.

CODE REQUIREMENTS FOR WHICH THE RELIEF IS REQUESTED:

Relief is requested from the requirements of IWA-7210 in 1986 Edition no Addenda ASME Section XI, and as an alternative, it is proposed that Code Case N-528-1 be utilized. A copy of Code Case N-528-1 is included for information.

BASIS FOR RELIEF:

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the requirements of IWA-7210. Code Case N-528-1 applies to metallic material meeting the definition of IWA-9000 that is purchased, exchanged, or transferred between nuclear plant sites. Code Case N-528-1 provides an alternative to the specific administrative requirements of ASME Section III that refer to possession of a Certificate of Authorization or Quality System Certificate (Materials). The case was approved by the ASME Boiler and Pressure Vessel Committee on May 7, 1999.

**RELIEF REQUEST A-3 UNIT 2(Contd.)
REQUEST FOR RELIEF TO USE ASME CODE CASE N-528-1**

Code Case N-528-1 provides an alternative to the administrative requirements of ASME Section III imposed by IWA-7210. TXU Electric has reviewed Code Case N-528-1 and has determined that its implementation will substantially reduce nonbeneficial work activities required by IWA-7210.

The ASME Boiler and Pressure Vessel Code Committee evaluated the proposed alternatives contained in Code Case N-528-1 and determined that they are acceptable for replacement activities involving material meeting the definition in IWA-9000. The implementation of Code Case N-528-1 will not affect the level of quality and safety nor decrease the margin of public health and safety. The implementation of Code Case N-528-1 is consistent with the intent to eliminate nonbeneficial work activities and their associated costs. Therefore, it is requested that the proposed alternative be authorized pursuant to 10 CFR 50.55a(a)(3)(i).

ALTERNATE EXAMINATION:

TXU Electric will comply with the requirements of Code Case N-528-1 in lieu of the requirements of IWA-7210. As required by Code Case N-528-1, TXU Electric will perform an evaluation of material which has been fabricated in accordance with specific dimensional requirements in accordance with IWA-7220 to determine its suitability for use in its intended application, including any differences that might affect form, fit, or function.

APPLICABLE TIME PERIOD

Alternative is requested for the date of approval by the NRC for the operating life of the plant.