March 6, 2002

Mr. Robert G. Byram
Senior Vice President
and Chief Nuclear Officer
PPL Susquehanna, LLC
2 North Ninth Street
Allentown, PA 18101

SUBJECT: SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2 - RELIEF REQUESTS FROM IST AND ASME CODE, SECTION III, REQUIREMENTS (TAC NOS. MB3271 AND MB3272)

Dear Mr. Byram:

In a letter dated October 18, 2001, as supplemented February 5, 2002, PPL Susquehanna, LLC, the licensee for the Susquehanna Steam Electric Station, Units 1 and 2 (SSES 1 and 2), submitted the following: (1) a revision to Relief Request No. 34 (RR-34) related to Inservice Inspection Testing (IST), and (2) a new relief request from American Society of Mechanical Engineers (ASME) Code, Section III, requirements related to design pressure for piping. The licensee submitted the revision to the RR-34 request pursuant to Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(f)(6)(i), as a proposed alternative to the requirements of ASME Code, Section XI. Additionally, the licensee submitted the new request pursuant to 10 CFR 50.55a(a)(3), as a proposed alternative to the requirements of ASME Code, Section III.

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the request for the proposed revision to RR-34 against the requirements of ASME Code, Section XI, OM-1987, Part 1, Paragraph 1.3.3.1(b). The NRC staff also has reviewed the new relief request and determined that the regulations in 10 CFR 50.55a(d), concerning ASME Code, Section III, design requirements for Class 2 components do not apply to SSES 1 and 2. The results of the review are provided in the enclosed safety evaluation (SE).

The NRC staff has concluded that the proposed alternative to the ASME Code, Section XI, requirements would provide an acceptable level of quality and safety. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remainder of the terms of the current operating licenses. As discussed with members of your staff, the NRC staff also has concluded that authorization of the proposed alternative to the requirements of ASME Code, Section III, pursuant to 10 CFR 50.55a(a)(3) is not required. Consequently, the licensee has withdrawn the proposed alternative in the February 5, 2002, submittal based on an evaluation performed pursuant to the provisions of 10 CFR 50.59.

If you have any questions, please contact your project manager, Timothy Colburn, at (301) 415-1402.

Sincerely,

/RA/

Joel T. Munday, Acting Chief, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-387 and 50-388

Enclosure: Safety Evaluation

cc w/encl: See next page

If you have any questions, please contact your project manager, Timothy Colburn, at (301) 415-1402.

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/RA/

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*See safety evaluation dated 2/15/02. No major changes made.

ACCESSION NO.: ML020560602

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO RELIEF REQUEST FROM INSERVICE INSPECTION TESTING AND

AMERICAN SOCIETY OF MECHANICAL ENGINEERS

SECTION III REQUIREMENTS

PPL SUSQUEHANNA, LLC

ALLEGHENY ELECTRIC COOPERATIVE, INC.

SUSQUEHANNA STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-387 AND 388

1.0 INTRODUCTION

Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a(f), requires that inservice testing (IST) of certain American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* (Code), Class 1, 2, and 3, pumps and valves be performed in accordance with Section XI, of the ASME Code and applicable addenda, except where alternatives have been authorized or relief has been requested by the licensee and granted by the U.S. Nuclear Regulatory Commission (NRC) pursuant to 10 CFR 50.55a, paragraph (a)(3)(i), (a)(3)(ii), or (f)(6)(i). In proposing alternatives or requesting relief, the licensee must demonstrate that: (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance is impractical for the facility.

Pursuant to 10 CFR 50.55a(f)(4)(iv), IST of pumps and valves may meet the requirements set forth in subsequent editions and addenda of the ASME Code that are incorporated by reference in 10 CFR 50.55a(b), subject to the limitations and modifications listed therein, and subject to Commission approval. Portions of editions and addenda may be used provided that related requirements of the respective editions and addenda are met.

In a letter dated October 18, 2001, as supplemented February 5, 2002, PPL Susquehanna, LLC, the licensee for the Susquehanna Steam Electric Station, Units 1 and 2 (SSES 1 and 2), requested the following: (1) a revision to Relief Request No. 34 (RR-34) related to IST, and (2) a new relief request related to design pressure requirements for piping. Specifically, the licensee proposed an alternative to the ASME Code, Section XI, IST requirements to allow the main steam relief valves (MSRVs) to be tested within three 24-month fuel cycles (or 6 years) rather than a 5-year period. Additionally, the licensee proposed an alternative to the ASME Code, Section III, pressure design requirements for piping to allow the use of an alternate allowable stress, determined in accordance with ASME Code, Section III, Paragraph III-3210, to qualify a portion of the high pressure coolant injection (HPCI) main pump discharge piping for postulated system transients associated with the +3 percent setpoint tolerance. The NRC staff has reviewed the information submitted by the licensee as discussed below.

2.0 REVISED RELIEF REQUEST RR-34

2.1 Code Requirement for which Relief is Requested

The licensee requested relief from the requirements of ASME Code, Section XI, OM-1987, Part 1, Paragraph 1.3.3.1(b) for all the MSRVs listed in Table 1 below. Paragraph 1.3.3.1(b) requires all pressure relief valves of each type and manufacturer be tested within each subsequent 5-year period with a minimum of 20 percent of the valves tested within any 24 months. This 20 percent shall be previously untested valves, if they exist.

Main Steam Relief Valves (Table 1)

Unit-1 Valve Nos.	Category	Unit-2 Valve Nos.	Category
PSV-141F013A	C	PSV-241F013A	C
PSV-141F013B	C	PSV-241F013B	C
PSV-141F013C	C	PSV-241F013C	C
PSV-141F013D	C	PSV-241F013D	C
PSV-141F013E	C	PSV-241F013E	C
PSV-141F013F	C	PSV-241F013F	C
PSV-141F013H	C	PSV-241F013H	C
PSV-141F013P	C	PSV-241F013P	C
PSV-141F013R	C	PSV-241F013R	C
PSV-141F013S	C	PSV-241F013S	C
PSV-141F013G	B, C	PSV-241F013G	B, C
PSV-141F013J	B, C	PSV-241F013J	B, C
PSV-141F013K	B, C	PSV-241F013K	B, C
PSV-141F013L	B, C	PSV-241F013L	B, C
PSV-141F013M	B, C	PSV-241F013M	B, C
PSV-141F013N	B, C	PSV-241F013N	B, C

2.2 Licensee's Proposed Alternative to the ASME Code

Pursuant to 10 CFR 50.55a(f)(6)(i), in the October 18, 2001, letter, as supplemented by letter dated February 5, 2002, the licensee proposed:

> The Main Steam Safety Relief Valves will be tested such that a minimum of 20% of the valves (previously untested, if they exist) are tested every 24 months, such that all the valves will be tested within 3 refuel cycles. This proposal utilizes the same maintenance and testing approach that was applied in 18-month refuel cycles. This alternative frequency will continue to provide assurance of the valve operational readiness, as required by [ASME Code, Section XI,] OM-1987, Part 1, Paragraph 1.3.1.2, and provides an acceptable level of quality and safety.

Additionally, any failures, either seat leakage or pressure set, occurring at the test facility, as well as weeping MSRV's that develop during the operating cycle, will be documented via the corrective action program, evaluated and dispositioned accordingly.

2.3 Licensee's Bases for Alternative (as stated)

The licensee states:

Pursuant to 10 CFR 50.55a(f)(6)(i), relief is requested from the requirements of ASME Code Section XI, OM-1987 Part 1, Paragraph 1.3.3.1(b). Due to Susquehanna's implementation of a 24-month fuel cycle, the requirements described above potentially compromise radiation safety and could jeopardize refueling outage schedule durations. The proposed alternative testing frequency will continue to provide an acceptable level of quality and safety pursuant to 10 CFR 50.55a(a)(3)(i).

Susquehanna currently removes and tests 8 of the 16 Main Steam Safety/Relief Valves during each refueling outage. This methodology meets the [ASME] Code criteria of testing previously untested valves and permits the removal and replacement of weeping valves detected during the previous operating cycle. Weeping MSRV's are detected by monitoring tailpipe temperatures. If the tailpipe temperature exceeds 200 degrees F, then the relief valve is viewed as a weeper. With an 18-month fuel cycle, the completion of the [ASME] Code testing was accomplished over a period of 3 refuel cycles. This approach has resulted in maintenance and operational flexibility which has had the following benefits for Susquehanna:

- Provides the ability to both test the [ASME] Code required valves out of the population not yet tested, and replace any weeping MSRV's.
- Maintains relatively leak-free MSRV's, thus minimizing the necessary run time of ECCS systems that provide suppression pool cooling.
- Consistent application of ALARA principles.
- Enhances equipment reliability.
- Results in a minimal impact on outage durations.

Without Code relief for 24-month fuel cycles, strict [ASME] Code compliance would restrict Susquehanna's operating philosophy to not operate with weeping MSRV's as [ASME] Code testing would be required to be completed within 5 years. This testing strategy does not account for any leaking valves that may need to be refurbished. Since Susquehanna's philosophy is to share spare valves between both units, (the valves that are removed from one unit are installed in the other unit's next refueling outage), this testing strategy is less than adequate. This strategy could only be accomplished if a larger population of MSRV's are tested each outage or additional spare valves are purchased. More than 8 valves would need to be sent to the offsite testing facility during a refueling outage. The testing and return of these valves would have to be completed expeditiously in order to not impact the refuel outage schedule duration. For this reason, additional expenditures would be incurred to purchase and test a greater number of valves each outage. Without [ASME] Code relief, the additional outage work would be contrary to the principles of ALARA and could compromise radiation safety. Because of the location of certain MSRV's in the

containment, interferences exist that would require the removal of more valves and piping to get to those valves that must be removed for the sample testing. This results in more radiation exposure to the maintenance personnel than is desirable.

With [ASME] Code relief, the total of 16 MSRV's per unit and 8 spares that are shared between the two units can be tested within 6 years to complete the [ASME] Code required testing for the total population and accommodate any weeping MSRVs.

The increased testing over only 2 refuel cycles will result in no additional safety benefit to the plant. Susquehanna has had excellent performance with MSRV's over last 10 years. Since 1987, Susquehanna has imposed more conservative as-left leakage criteria on the testing facility than was specified in the General Electric Specification and incorporated in the PP&L Specification for testing Crosby-style relief valves. The criterion imposed on the test lab is 0-ml/5 min (via the purchase order), compared to a GE specification "as-left" leakage criteria of 38-ml/5 min.

Additionally, a review of the setpoint testing results (for both units) for the time period from initial operation to the present (June, 2001), which comprises 231 data points, shows that the average of the setpoint drift percentages is -0.687%. This indicates that, in general, the SRV's [setpoints] tend to drift slightly downward, not upward. The calculated standard deviation from the average for the data was determined to be 1.45%. The data indicates that a significant number of the as-found set-points were outside the +/- 1% tolerance allowed by the plant Technical Specifications [TSs]. However, most of the points outside the TS tolerance were below -1%, not above +1%, which results in a slightly downward setpoint drift trend over time. This indicates that for the longer test interval proposed, there is not expected to be a reduced capability of the SRV's to provide adequate system overpressure protection. Also, the testing history shows that since commercial operation, we [SSES 1 and 2] have had only two "as found" set pressure test acceptance criteria failures (+3%) of the tested valves, which required testing of additional MSRV's.

2.4 Evaluation

ASME Code, Section XI, OM-1987, Part 1, Paragraph 1.3.3.1(b), requires all pressure relief valves of each type and manufacturer to be tested within each subsequent 5-year period with a minimum of 20 percent of the valves tested within any 24 months. This 20 percent shall be previously untested valves, if they exist. Similar relief requests have been authorized for SSES 1 and 2 in the NRC staff's safety evaluations, "Evaluation of Safety Relief Valve Inservice Testing Relief Request for Susquehanna Steam Electric Station, Unit 1, Docket No. 50-387," dated April 7, 1998, and "Evaluation of Safety Relief Valve Inservice Testing Relief Request for Susquehanna Steam Electric Station, Unit 2, Docket No. 50-388," dated December 16, 1998. The licensee has submitted the revised relief requests for SSES 1 and 2 due to changes in the MSRV's setpoint tolerance from ±1 percent to ±3 percent as specified in the TSs.

The NRC staff has reviewed the licensee's safety relief valve (SRV) test results to determine if the licensee's proposed alternative testing provides an acceptable level of quality and safety. This included setpoint test results for the time period from initial operation to June 2001 comprising 231 data points. The average of the setpoint drift percentages is -0.687 percent

which indicates that, in general, the SRV setpoints tend to drift slightly downward, not upward. The licensee also calculated the standard deviation from the average for the data set and determined it to be 1.45 percent. The data indicates that a significant number of as-found setpoints are outside the ±1 percent tolerance allowed by the plant TSs. Most of the points outside the TS tolerance were below -1 percent, not above +1 percent, which results in a slightly downward setpoint drift trend over time. This indicates that for the longer test interval proposed, there is not expected to be a reduced capability of the SRVs to provide adequate overpressure protection. The TS value of MSRV tolerances is proposed to be revised from ±1 percent to ±3 percent. Therefore, all the drift values will be within the tolerance of the TS value. The licensee states that the testing history shows that, since commercial operation, there were only two "as found" valves above the +3 percent tolerance allowed by ASME Code, Paragraph 1.3.4(d), which requires testing of additional MSRVs. Another consideration is that with the licensee's proposed alternative testing, if setpoints are found above the ASME Code +3 percent tolerance, at least two additional valves are required to be tested for each valve found above +3 percent, which would significantly increase the rate of testing as a corrective measure. Also, the licensee states that the MSRVs will be tested such that a minimum of 20 percent of the valves (previously untested, if they exist) are tested every 24 months such that all the valves will be tested within 3 refuel cycles.

The revised TS value tolerances are consistent with the values as provided in Licensing Topical Report NEDC-31753P. The NEDC-31753P Topical Report was approved by the NRC in a letter to the BWR Owners Group dated March 8, 1993. This topical report provides that, for an increase in SRV TS tolerances to ±3 percent, all SRVs must be tested within 40 months. However, due to the above considerations, the NRC staff finds that, given that the TS SRV tolerances are ±3 percent, allowing testing to be extended to three 24-month cycles with a minimum of 20 percent of previously untested valves tested during any one outage (24 months) provides an acceptable level of quality and safety because it provides assurance that the SRVs will be capable of performing their safety function.

Based on a review of the information provided by the licensee as discussed above, the NRC staff concludes that the licensee's proposed alternative as specified in the revised RR-34, is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remainder of the terms of the current operating licenses on the basis that the alternative provides an acceptable level of quality and safety.

3.0 RELIEF REQUEST FROM ASME CODE SECTION III REQUIREMENTS

3.1 Code Requirement for which Relief is Requested

The licensee has requested relief from the applicable piping design code for SSES 1 and 2. The applicable design code for ASME piping is the ASME Code, Section III, 1971 Edition through and including the Winter 1972 Addenda. Design requirements for ASME Code, Class 2, components are specified in Subsection NC, Article NC-3000. Paragraph NC-3641.1 specifies the minimum wall thickness requirements for piping subjected to internal pressure.

3.2 Licensee's Proposed Alternative to the ASME Code

Pursuant to 10 CFR 50.55a(a)(3), in the October 18, 2001, letter, as supplemented by letter dated February 5, 2002, the licensee proposed to allow the use of an alternative allowable stress, determined in accordance with Paragraph III-3210 of the ASME Code, in lieu of the maximum allowable stress defined in the applicable table in Appendix I of ASME Code, per NC-3641.1.

3.3 Licensee's Bases for Alternative (as stated)

> The Main Steam Safety Relief Valve[s] (MSRV[s]) setpoint tolerance is being increased from [±] one percent to [±] three percent. The increased setpoint tolerance will allow a higher steam inlet pressure at the HPCI Turbine. This results in a higher maximum turbine speed, and, ultimately, the HPCI Main Pump maximum discharge pressure will be increased to 1583 psig. This maximum pressure would only occur under pump deadhead conditions.
>
> The affected piping must be qualified for the increased maximum pressure. A review of the applicable piping design analysis was performed. The pipe class EBB portion of the HPCI Main Pump discharge piping, designated as pipeline EBB-102/202, had been previously qualified to a maximum pressure of only 1360 psig. Thus, it was necessary to evaluate the class EBB portion of the discharge piping for the higher maximum pressure of 1583 psig.
>
> The EBB portion of the discharge piping consists of a 14" x 10" reducer, welded to the 10" pump discharge nozzle, approximately 70 linear feet of 14" piping, 60 linear feet of 4" piping, and various lengths of 1", 3/4", and ½" piping for vents, drains, and instrumentation. Piping class EBB is designed as ASME [Code,] Section III, Class 2. All piping is ASME [Code,] SA-106, Grade B, seamless [carbon-steel] material. The 14" x 10" reducer is a butt weld fitting per ASME [Code,] SA-234, Grade WPB, with wall thickness to match the piping.
>
> The evaluation considered all affected piping. Using the applicable design code, the evaluation determined that the higher pressure was not acceptable for the 14" EBB-102/202 HPCI Main Pump discharge piping and the 10" diameter section of the 14" x 10" piping reducer welded to the pump discharge nozzle.
>
> In order to qualify the affected piping for the HPCI Main Pump maximum discharge pressure of 1583 psig, relief is requested from the use of the [ASME] [C]ode, [Appendix I], allowable stress (S) as specified in Table I-7.1 for SA-106 Grade B material at a design temperature of 220°F.
>
> For the construction of the Susquehanna SES Units 1 and 2, vendors submitted Certified Material Test Reports (CMTR's) for all Quality-related piping materials. The CMTR's include test data for the actual yield and ultimate (tensile) stress values of the piping material. Article III-3000 of the ASME Code Section III discusses the basis for establishing allowable stress values. Paragraph III-3210 species that the maximum allowable stress

(S) is the lowest of 1/4 of the tensile strength at room or design temperature, or 5/8 of the yield strength at room or design temperature. Accordingly, the CMTR data for yield and ultimate (tensile) strength may be used to develop an alternate allowable stress for the HPCI Main Pump discharge piping.

3.4 Evaluation

The NRC staff has reviewed the licensee's request for its proposed alternative pursuant to 10 CFR 50.55a(a)(3). The NRC staff finds that ASME Code, Section III, requirements for Quality Group B components (ASME Code, Class 2 components) such as the piping components as stated in 10 CFR 50.55a(d), apply to nuclear power plants whose applications for construction permits (CPs) were docketed after May 14, 1984. The CPs for SSES 1 and 2 were both docketed prior to May 14, 1984. Therefore, the regulations in 10 CFR 50.55a(d) concerning ASME Code, Section III, design requirements for Class 2 components do not apply to SSES Units 1 and 2. Accordingly, authorization of an alternative to ASME Code, Section III design requirement pursuant to 10 CFR 50.55a(a)(3) is unnecessary and inappropriate for SSES 1 and 2. Therefore, the licensee may either modify the plant to conform to the provisions of the current licensing and design-basis information, or change the current licensing and design-basis information to accurately reflect the existing plant design. In response to NRC's request for additional information, "Susquehanna Steam Electric Station, Units 1 and 2, Request for Additional Information, Re: Amendment Request to Revise MSRV Setpoint Tolerance (TAC Nos. MB3273 and MB3274)," dated January 8, 2002, the licensee took the action pursuant to the provisions of 10 CFR 50.59, and determined that the HPCI main and booster pump discharge piping still meets the intent of the ASME Code with an MSRV setpoint tolerance of ±3 percent. The results of the licensee's evaluation pursuant to the provisions of 10 CFR 50.59 are provided in the February 5, 2002, submittal.

Based on a review of the new relief request, the NRC staff has determined that the authorization of an alternative or relief from ASME Code, Section III, design provisions for ASME Code, Class 2, components is unnecessary and inappropriate for SSES 1 and 2. The licensee resolved the existing condition/deviation by revising the licensing and design commitments in accordance with the provisions of 10 CFR 50.59, and determined that the HPCI main and booster pump discharge piping still meets the intent of the ASME Code with an MSRV setpoint tolerance of ±3 percent.

4.0 CONCLUSION

The NRC staff concludes that the licensee's proposed alternative to the ASME Code, Section XI, requirements would provide an acceptable level of quality and safety and is authorized pursuant to 10 CFR 50.55a(a)(3)(i) for the remainder of the terms of the current operating licenses. In addition, the NRC staff also has concluded that authorization of the proposed alternative to the requirements of ASME Code, Section III, pursuant to 10 CFR 50.55a(a)(3) is not required.

Principal Contributor: G.S. Bedi

Date: March 6, 2002

Susquehanna Steam Electric Station,
Units 1 &2

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