

August 28, 2002

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES), UNITS 1 AND 2  
RE: RELIEF FROM THE REQUIREMENTS OF THE AMERICAN SOCIETY OF  
MECHANICAL ENGINEERS (ASME) BOILER AND PRESSURE VESSEL CODE  
(CODE), SECTION XI, CONCERNING RELIEF REQUEST A-2, REVISION 2 ,  
FOR THE FIRST INSERVICE TEST (IST) INTERVAL (DUTIES OF THE  
AUTHORIZED NUCLEAR INSERVICE INSPECTOR) (TAC NOS. MB5577 AND  
MB5578)

Dear Mr. Terry:

By letter dated July 11, 2002, TXU Energy (TXU), submitted a request for relief from the ASME Code, Section XI, IWA-2110 of the 1989 edition concerning the duties of an Authorized Nuclear Inservice Inspector (ANII). The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the relief request and concludes that Relief Request A-2, Revision 2, to eliminate the specific requirements for the ANII from the IST program for pumps and valves, is authorized pursuant to 50.55a(a)(3)(i) of Title 10 of the *Code of Federal Regulations* for CPSES, Units 1 and 2, for the first IST interval on the basis that the alternative provides an acceptable level of quality and safety.

The NRC staff's safety evaluation is enclosed.

Sincerely,

*/RA/*

Robert A. Gramm, Chief, Section 1  
Project Directorate IV  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-445 and 50-446

Enclosure: Safety Evaluation

cc w/encl: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

FIRST 10-YEAR INSERVICE TEST INTERVAL

REQUEST FOR RELIEF

TXU ENERGY

COMANCHE PEAK STEAM ELECTRIC STATION, UNITS 1 AND 2

DOCKET NOS. 50-445 AND 50-446

1.0 INTRODUCTION

By letter dated July 11, 2002, TXU Energy (TXU, the licensee), licensee for Comanche Peak Steam Electric Station (CPSES), Units 1 and 2, submitted a request for relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, IWA-2110 of the 1989 edition concerning requirements pertaining to the duties of an Authorized Nuclear Inservice Inspector (ANII).

2.0 BACKGROUND

Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.55a, requires that inservice testing (IST) of certain ASME 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 or the Commission) pursuant to paragraphs (a)(3)(i), (a)(3)(ii), or (f)(6)(i) of 10 CFR 50.55a. 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 its facility. Section 50.55a of 10 CFR authorizes the Commission to approve alternatives and to grant relief from ASME Code requirements upon making the necessary findings. NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," dated April 13, 1989, provides alternatives to the Code requirements which are acceptable. Further guidance is given in GL 89-04, Supplement 1, dated April 4, 1995, and NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," dated April 1995.

3.0 EVALUATION

3.1 Relief Request A-2, Revision 2

The licensee has requested relief for IST of pumps and valves from the requirements of the 1989 Edition of the ASME Code, Section XI, IWA-2110, which states, in part, that it is the duty

ENCLOSURE

of the inspector to verify that the ISTs and examinations required have been completed and the results recorded.

### 3.1.1 Licensee's Basis for Requesting Relief

The licensee states:

The Authorized Nuclear Inservice Inspector's (ANII) required review of the IST Program is less comprehensive than the review required for the ASME Section XI inservice inspection activities. Section IWA-2110 of the Code specifies the duties of the ANII relative to the inservice test(s) performed for pumps and valves and component supports as simply verifying that inservice tests have been performed and the results recorded. In general, ANIIs do not have the training or background experience to make determinations about component safety functions in order to verify program scope, or to assess the operational readiness of components based on test results. Consequently, the ANII review provides little benefit.

Comanche Peak Steam Electric Station (CPSES) has a multi-layered review process that performs the same functions as the ANII noted above but with individuals who have extensive experience in the Code-required testing of pumps and valves. Also, the IST Program is subject to the CPSES Quality Assurance Program that provides an equivalent, or greater level of quality and safety than the requirements for ANII involvement specified in the Code. Therefore, there is no quality-related benefit in the ANII duplicating the review efforts performed by station personnel.

The licensee also notes that reference to IST on pumps and valves as a duty of the ANII has been eliminated in ASME Section XI, IWA-2110, 1998 Edition, 2000 Addenda.

### 3.1.2 Alternative Testing

The licensee proposes that the ASME Section XI Code requirements specifying the duties of the ANII described in IWA-2110 will be eliminated from the IST Program.

### 3.1.3 Evaluation of Relief Request A-2, Revision 2

Section XI, IWA-2110 of the 1989 ASME Code, as well as the 1995 Edition with the 1996 Addenda of the Operation Maintenance (OM) Code, requires that IST activities be verified by an ANII. It is the ANII's duties to verify that ISTs on pumps, valves, and component supports have been completed and results recorded. The licensee proposes to eliminate from the IST program for pumps and valves the specific duties for the ANII. The licensee states that CPSES has a multi-layered review process that performs the same functions as the ANII with individuals who have extensive experience in the Code-required testing of pumps and valves. Also, the IST program is subject to the CPSES quality assurance program that provides an equivalent or greater level of quality and safety than the requirements for ANII involvement specified in the Code.

As stated by the licensee, CPSES has a multi-layered review process that performs the same functions as the ANII. ANIIs generally do not have the training or background experience to make determinations of the safety function of components in order to verify the scope of the

IST program, or assess the operational readiness of components based on test results. Furthermore, in the 1998 Edition, 2000 Addenda of the OM Code, the requirements for the ANII have been removed.

On the basis that the licensee's review process for its IST program provides an equivalent or higher level of quality and safety as the Code requirements for ANII involvement, the staff finds that the proposed alternative is acceptable.

#### 4.0 CONCLUSIONS

The staff concludes that Relief Request A-2, Revision 2, to eliminate the specific requirements for the ANII from the IST Program for pumps and valves is authorized, for the CPSES, Units 1 and 2, first IST interval, pursuant to 10 CFR 50.55a(a)(3)(i) on the basis that the alternative provides an acceptable level of quality and safety.

Principal Contributor: G. Klein

Date: August 28, 2002

Comanche Peak Steam Electric Station

cc:

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
P. O. Box 2159  
Glen Rose, TX 76403-2159

Regional Administrator, Region IV  
U.S. Nuclear Regulatory Commission  
611 Ryan Plaza Drive, Suite 400  
Arlington, TX 76011

Mr. Roger D. Walker  
Regulatory Affairs Manager  
TXU Generation Company LP  
P. O. Box 1002  
Glen Rose, TX 76043

George L. Edgar, Esq.  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, DC 20036-5869

County Judge  
P. O. Box 851  
Glen Rose, TX 76043

Environmental and Natural  
Resources Policy Director  
Office of the Governor  
P. O. Box 12428  
Austin, TX 78711

Richard A. Ratliff, Chief  
Bureau of Radiation Control  
Texas Department of Health  
1100 West 49th Street  
Austin, TX 78756-3189

Brian Almon  
Public Utility Commission  
William B. Travis Building  
P. O. Box 13326  
1701 North Congress Avenue  
Austin, TX 78701-3326

Wade Wheatley, Director  
Waste Permits Division  
Texas Natural Resource Conservation  
Commission  
P. O. Box 13087 (MS 126)  
Austin, TX 78711-3087