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Docket Number 50-346

License Number NPF-3

Serial Number 2808

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United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555-0001

Subject: Revision to 10 CFR 50.55a Request RR-B4 Regarding American Society of Mechanical Engineers Boiler and Pressure Vessel Code Inservice Inspection Requirement at the Davis-Besse Nuclear Power Station (TAC No. MB1607)

Ladies and Gentlemen:

The FirstEnergy Nuclear Operating Company letter Serial Number 2672, dated September 19, 2000, submitted the revised Davis-Besse Nuclear Power Station, Unit 1 (DBNPS) Inservice Inspection Program for the third ten-year interval based on Section XI of the 1995 Edition and Addenda through the 1996 Addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. Included with the program revision were several 10 CFR 50.55a requests related to specific conformance with certain Code requirements. This letter provides a revision to the 10 CFR 50.55a request RR-B4 consistent with discussions with members of the Nuclear Regulatory Commission (NRC) Nuclear Reactor Regulation (NRR) staff on September 5, 2002. Specifically, the 10 CFR 50.55a request for RR-B4 has been revised to delete the references to NRC Regulatory Guide 1.147 and Code Case N-522. The revision to RR-B4 is attached for NRC review and approval.

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Should you have any questions or require additional information, please contact Mr. Patrick J. McCloskey, Manager-Regulatory Affairs, at (419) 321-8450.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Lew W. Myers".

DRW/RMC/s

Attachments

cc: J. E. Dyer, Regional Administrator, Region III  
J. B. Hopkins, NRC/NRR Senior Project Manager  
C. S. Thomas, DB-1 Senior Resident Inspector  
Utility Radiological Safety Board

**FIRST ENERGY NUCLEAR OPERATING COMPANY  
DAVIS-BESSE UNIT 1  
THIRD 10-YEAR INTERVAL  
RELIEF REQUEST RR-B4**

**System/Component(s) for Which Relief is Requested:**

ASME Code Section XI, Class 2 Piping

1. Containment Purge System Piping from Valve CV5005 to Valve CV5006 (Line HBB-17) at Containment Penetration 33.
2. Containment Purge System Piping from Valve CV5007 to Valve CV5008 (Line HBB-18) at Containment Penetration 34.

**Code Requirement:**

Table IWC-2500-1, Examination Category C-H, Code Item No. C7.30 of the 1995 Edition, 1996 Addenda of ASME Code Section XI requires a system leakage test of piping once each inspection period using a VT-2 visual inspection.

**Code Requirement from Which Relief is Requested:**

Portions of the piping segments between the containment isolation valves for Containment Purge System Penetrations 33 and 34 are inaccessible. Relief is requested to the above referenced ASME Code Section requirement regarding the use of a VT-2 visual examination of the complete piping segment between the containment isolation valves.

**Basis for Relief:**

Containment Purge System Penetrations 33 and 34 piping are tested in accordance with 10 CFR Appendix J, Option B, Type C testing requirements. If leakage is identified during the test, the test boundary is VT-2 visually examined with the soap bubble technique to verify the source of leakage is not through-wall leakage.

Rubber foam barriers and rubber boots installed around the piping at the containment penetrations prohibit access to a portion of the pipe segment. The containment penetration sleeve also extends to within 3 inches of the containment

isolation valve prohibiting access to a portion of the piping within the sleeve. Due to this configuration, it is not practical to use a soap bubble technique VT-2 visual examination along the entire length of the pipe. Even the removal of the fire penetration barriers and rubber boots would not allow for a complete soap bubble technique VT-2 visual examination due to the length of the pipe and lack of clearance between the pipe and penetration sleeve.

During normal operations, the containment purge valves are normally closed and the piping is subjected to atmospheric conditions. The inaccessible area contains only longitudinal welds. As these longitudinal welds area were made during the pipe manufacturing process under controlled conditions, it is highly unlikely that inservice flaws would develop under the piping's normal service conditions.

Accordingly, relief is requested pursuant to 10 CFR 50.55a(g)(5)(iii) as the VT-2 examination of the inaccessible portions of the Containment Purge System piping is impractical to perform. A 10 CFR 50.55a request for this piping was previously approved by the NRC for the Second 10-Year Interval Inservice Inspection Program as Relief Request RR-B5 (TAC Nos. M79034 and M77942).

**Alternative Examination:**

Containment Purge System Penetrations 33 and 34 piping will be tested in accordance with 10 CFR Appendix J, Option B, Type C testing requirements. If leakage is noted during the test, the containment isolation valves and the accessible portions of the piping segment between the containment isolation valves will be VT-2 visually examined with the soap bubble technique to verify the source of leakage is not through-wall leakage.

**Justification for the Granting of Relief:**

The examination of portions of the piping segment between the Containment Purge Valves is impractical due to inaccessibility of the piping within the penetration sleeve and the penetration rubber foam barriers and rubber boots surrounding the piping. In order to perform the VT-2 visual examination to the entire piping segment between the containment isolation valves, the subject piping would require extensive design modifications. Due to the service conditions of this piping it is highly unlikely that service induced flaws would occur in the inaccessible piping portions.

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**Implementation Schedule:**

The Containment Purge System piping at Containment Purge System Penetrations 33 and 34 will be pressure tested in accordance with 10 CFR 50 Appendix J, Option B, Type C testing requirements each inspection period under the Third Ten-Year Interval Inservice Inspection Program.

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### COMMITMENT LIST

The following list identifies those actions committed to by the Davis-Besse Nuclear Power Station (DBNPS) in this document. Any other actions discussed in the submittal represent intended or planned actions the DBNPS. They are described only for information and are not regulatory commitments. Please notify the Manager - Regulatory Affairs (419-321-8450) at the DBNPS of any questions regarding this document or associated regulatory commitments.

#### COMMITMENTS

#### DUE DATE

None