

Stephen B. Bram
Vice President

Consolidated Edison Company of New York, Inc.
Indian Point Station
Broadway & Bleakley Avenue
Buchanan, NY 10511
Telephone (914) 737-8116

November 17, 1989

Re: Indian Point Unit No. 2
Docket No. 50-247

Document Control Desk
US Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

SUBJECT: Relief Request No. 29; ASME Section XI - Code Case N-432

In anticipation of the IP-2 mid cycle outage in March of 1990 for the purpose of steam generator inspection, we believe it desirable to establish repair methods at this time which, should they be needed, will be appropriately cognizant of ASME Section XI requirements and acceptable to the NRC.

One option is the employment of an automatic gas tungsten arc (GTAW) temperbead welding process. Use of this method is permitted by ASME Section XI Code Case N-432 which is acknowledged for use by the NRC in Regulatory Guide 1.147. The automatic GTAW temperbead process is a welding process which produces an as deposited tempered, heat-affected zone (HAZ) microstructure and weldment properties which are similar to that of GTAW weld deposits which have been post weld heat treated.

ASME Code Case N-432 defines the requirements for qualification of the GTAW process. The GTAW process has been qualified by Consolidated Edison, see attachment 1 to this letter. All Code Case requirements have been met except one. Due to material availability problems the exact material properties stipulated by the Code for the test material could not be achieved. Specifically, the base metal charpy-v-notch impact properties did not meet the minimum requirements specified by the Code Case using the 1980 Edition of the ASME Code (30 ft. lbs vs 50 ft. lbs).

Accordingly, attachment 2 contains a discussion and basis upon which Con Edison hereby requests that the NRC grant relief, per 10 CFR 50.55a subparagraph (6)(i), from strict interpretation of Code Case N-432 for this repair procedure.

This issue was discussed with representatives of NRR and Region I at the NRC's White Flint offices on Wednesday, October 10, 1989. On the basis of that meeting Con Edison concluded that the NRC had preliminarily concurred on technical grounds with the merits of this relief request. Con Edison is proceeding to incorporate Code Case N-432 into its ASME Section XI Inservice Inspection Program for the second inspection interval (July 1, 1984 - June 30, 1994). A prompt consideration of this relief request would be appreciated so that we may proceed with plans for the 1990 mid-cycle outage.

8911220154 891117
PDR ADCK 05000247
Q PDC

A047
11

Should you or your staff have any question regarding this matter, please contact Mr. Charles W. Jackson, Manager, Nuclear Safety and Licensing.

Very truly yours,



cc: Mr. William Russell (w/o Attachment 1)
Regional Administrator - Region I
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Donald S. Brinkman, Senior Project Manager (w/o Attachment 1)
Project Directorate I-1
Division of Reactor Projects I/II
US Nuclear Regulatory Commission
Mail Stop 14B-2
Washington, DC 20555

Senior Resident Inspector (w/o Attachment 1)
US Nuclear Regulatory Commission
PO Box 38
Buchanan, NY 10511