**Indian Point 3**
**Nuclear Power Plant**
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**NewYorkPower Authority**

**Robert J. Barrett**
Site Executive Officer

May 4, 1999
IPN-99-049

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
License No. DPR-64
**Relief Request to Use ASME Code Case N-522**

Dear Sir:

The purpose of this letter is to propose the use of ASME Code Case N-522 as an alternative to the ASME Code requirements of Table IWC-2500-1, Examination Category C-H for pressure testing of Class 2 components. Table IWC-2500-1, Examination Category C-H requires that a VT-2 visual examination be performed during the system leakage test once each period and during the system hydrostatic test once each interval for all Class 2 pressure-retaining components. Code Case N-522 allows the use of 10 CFR 50 Appendix J testing as an alternative to the rules in Table IWC-2500-1. The proposed alternative of using Code Case N-522 would apply to those systems or portions of systems that were upgraded to Class 2 from non-ISI Class as a result of the containment rulemaking, and provide an acceptable level of quality and safety.

In accordance with 10 CFR 50.55a(a)(3)(i), the Authority proposes to use Code Case N-522, "Pressure Testing of Containment Penetration Piping, Section XI, Division 1" for Indian Point 3. In addition to the requirements specified in Code Case N-522, the Authority will conduct the test at the peak calculated containment pressure and the test procedure will permit the detection and location of through-wall leakage in Containment Isolation Valves (CIVs) and pipe segments between the CIVs. A relief request is included in Attachment I. Code Case N-522 has been included in Draft Regulatory Guide 1.147, dated May 1997, and similar use of Code Case N-522 was approved by the NRC on November 25, 1998 for a period of 60 months for the FitzPatrick plant (Docket No. 50-333).

The Authority may use the proposed alternative in the upcoming refueling outage (RO) 10, and therefore requests that this relief request be dispositioned prior to the start of the outage (Scheduled for September 10, 1999).

The Authority is not making any new commitments in this submittal.

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If you have any questions, please contact Mr. K. Peters at (914) 736-8029.

Very truly yours,

Robert J. Barrett
Site Executive Officer
Indian Point 3 Nuclear Power Plant

Attachment: as stated

cc: Mr. Hubert J. Miller
Regional Administrator
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U.S. Nuclear Regulatory Commission
Resident Inspector's Office
Indian Point 3

Mr. George F. Wunder, Project Manager
Project Directorate I
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ATTACHMENT I TO IPN-99-049

RELIEF REQUEST TO USE ASME CODE CASE N-522

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

Docket No. 50-286
IPN-99-049
ATTACHMENT I

**Request for Relief: Use of ASME Code Case N-522, "Pressure Testing of Containment Penetration Piping, Section XI, Division 1"**

CODE REQUIREMENT: Table IWC-2500-1, Examination Category C-H, requires a VT-2 visual examination during the system leakage test (IWC-5221) once each period and during the system hydrostatic test (IWC-5222) once each interval for all ASME Class 2 pressure retaining components.

PROPOSED ALTERNATIVE: In accordance with 10 CFR 50.55a(a)(3)(i), the Authority proposes to use ASME Code Case N-522, "Pressure Testing of Containment Penetration Piping." The proposed alternative of using Code Case N-522 would apply to those systems or portions of systems that were upgraded to Class 2 from non-ISI Class as a result of the containment rulemaking (Federal Register Notice Vol. 61, No.154 dated August 8, 1996) and provide an acceptable level of quality and safety. In addition to the requirements specified in Code Case N-522, the Authority will meet the following conditions:

"The test will be conducted at the peak calculated containment pressure and the test procedure will permit the detection and location of through-wall leakage in Containment Isolation Valves (CIVs) and pipe segments between the CIVs."

BASIS FOR RELIEF: The Code requires that a VT-2 visual examination be performed during system pressure testing for all Class 2 pressure-retaining piping, including those segments that penetrate primary containment. As an alternative, the Authority proposes to implement the requirements of Code Case N-522, Pressure Testing of Containment Penetration Piping. Code Case N-522 specifies that 10 CFR 50 Appendix J testing may be used as an alternative to Section XI pressure tests, for certain containment penetration piping.

The subject piping is designated as Class 2 only because it penetrates the primary reactor containment and is considered an extension of the containment vessel. Since the piping on either side of these penetrations is non-classed, the requirements of Appendix J are more appropriate than those of Examination Category C-H. Appendix J pressure tests verify the leak tight integrity of the primary reactor containment and of systems and components that penetrate containment by local leak rate and integrated leak rate tests.

The Class 2 containment isolation valves (CIVs) and connecting pipe segments must withstand the peak calculated containment internal pressure. The Authority believes that the pressure retaining integrity of the CIVs and connecting piping and their associated safety functions may be verified with an Appendix J test conducted at the peak calculated containment pressure. The Authority proposes to perform the Appendix J testing at no less than the peak calculated containment pressure and will use procedures and techniques capable of detecting and locating through-wall leakage in the pipe segments between the CIVs. Use of Code Case N-522 in lieu of the leakage testing requirements of Table IWC-2500-1, Examination Category C-H provides an acceptable level of quality and safety.