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 Office of Nuclear Reactor Regulation, Director (post 851125)

SUBJECT: Requests relief from ASME Code, Section XI, Section IWA-4400
 pressure testing requirement for use of alternate means of
 pressure testing RCPB following repair work to be performed
 during current refueling outage. Fee paid.

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May 6, 1986

Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

MONTICELLO NUCLEAR GENERATING PLANT
DOCKET NO. 50-263 LICENSE NO. DPR-22

Request for Relief from ASME Code, Section XI,
Section IWA-4400 Pressure Testing Requirement

The purpose of this letter is to request NRC review and approval of the use of an alternate means of pressure testing the Monticello reactor coolant pressure boundary following repair work that is to be performed during the current refueling outage. Specifically, this is a request for relief from the pressure testing requirements of IWA-4400 of Section XI of the ASME Code, 1980 Edition, Winter 1980 Addenda. A check in the amount of \$150.00 is attached as the review application fee as required by 10 CFR Part 170.

The following repair work is planned for the current refueling outage:

Core Spray System

Replace safe-ends to remove service sensitive welds (14-inch x 8-inch OD carbon steel safe-ends). Also replace stainless steel piping with carbon steel piping (8-inch OD).

Control Rod Drive (CRD) Nozzle

Replace nozzle cap (4-inch OD stainless steel cap) to remove service sensitive weld.

Main Steam Drain Lines

Reroute drain lines (2-inch and 3-inch OD carbon steel).

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Section IWA-4400 of the code specifies a 110% of design pressure hydrostatic test to be performed following repairs of this type. In lieu of this test (1100 psig), a system leakage test will be performed at 100% of design pressure (1000 psig) as specified in IWA-5000. In addition, non-destructive testing (NDT) will be performed as follows:

Core Spray System

NDE to include visual (VT), penetrant (PT), radiographic (RT), and ultrasonic (UT) testing of butt welds and VT, PT, or magnetic particle (MT) testing of socket welds.

Control Rod Drive (CRD) Nozzle

NDE to include VT, PT, RT, and UT of weld.

Main Steam Drain Lines

NDE to include VT, PT, or MT of socket welds.

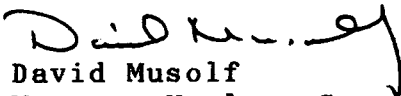
Significant additional radiation exposure, labor, outage time, and materials costs are incurred for testing at 1100 psig as opposed to 1000 psig. Testing at 1100 requires removal of safety/relief valves and installing blank flanges in their place. It is our view that performance of additional NDE in lieu of an increase in test pressure of 100 psi offers greater assurance of a satisfactory repair.

With the extensive NDE planned, the addition of 100 psi to the pressure boundary test does not provide any significant additional verification of pressure boundary integrity. This procedure has been followed in the past for piping and safe-end replacement projects such as feedwater nozzle safe-ends, safety/relief valve sweepolets, core spray piping, and recirculation bypass piping.

The reactor coolant system pressure boundary pressure test is currently scheduled for June 16, 1986. NRC review and approval of this request is needed prior to this date.

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Please contact us if you have any questions related to our request for approval of the alternate method we have described to verify reactor coolant system pressure boundary integrity.


David Musolf
Manager Nuclear Support Services

c: NRR Project Manager, NRC
Resident Inspector, NRC
Regional Administrator, Region III, NRC
G Charnoff

Attachment - Check