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SUBJECT: Suppls 860506 requests re use of alternate means of pressure testing RCPB following repair work during current refueling outage. Addl info supporting request includes radiation exposure & addl NDE.

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May 23, 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

Supplemental Information Related to
Request for Relief from ASME Code, Section XI,
Paragraph IWA-4400 Pressure Testing Requirement

The purpose of this letter is to supplement our request dated May 6, 1986 related to 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. This information was requested during a telephone conference call with the NRC Staff.

The following additional information is provided in support of our request:

Use of Safety/Relief Valve Gaging Devices

Monticello has eight three-stage Target Rock safety/relief valves installed on the main steam lines. We believe there is no prudent way of gaging these valves. The valve manufacturer indicates that a gaging device design exists. This gaging procedure, which involves bonnet cap removal, introduces the possibility of set pressure adjusting ring disruption.

We have contacted five other operating BWR plants with this type of valve and none use this gaging procedure.

Steam testing of a new set of topworks (pilot/2nd stage assemblies) has just been completed by Target Rock. This will provide a high degree of assurance that the valves will be properly set during plant operation. We do not believe it is prudent or desirable to introduce the possibility of setpoint error through use of a gaging device.

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Radiation Exposure

Conducting the post-repair vessel hydrostatic test at 110% of operating pressure instead of 100% of operating pressure (as requested in our May 6, 1986 application) will require the removal of safety/relief valves, installation of covers, and removal of the covers and replacement of valves following the test since gaging is not prudent. From review of past exposure history records, approximately eight to ten person-rem are required for this work.

Outage Time Requirements

Valve removal and replacement, as described above, will require approximately six days for maintenance crews to accomplish. Three of these days will be on the outage critical path. Extending the outage for approximately three days will result in additional costs of roughly $600,000.

Additional NDE

As noted in our May 6, 1986 application, additional nondestructive examination (NDE) will be performed on repairs made during the 1986 outage. The extent of this NDE is well in excess of ASME Code requirements and offers substantially more assurance of pressure boundary integrity than an increase in test pressure from 1000 psig to 1100 psig would provide.

Please contact us if you have any additional questions related to our request.

David Musolf
Manager Nuclear Support Services

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