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SUBJECT: Requests authorization to use ASME Code Case N-416-1, "Alternate Pressure Test Requirements..." & Code Case N-498-1, "Alternate Rules for 10-Yr Sys Hydrostatic Testing..." in Nine Mile Point Units 1 & 2 ISI programs.

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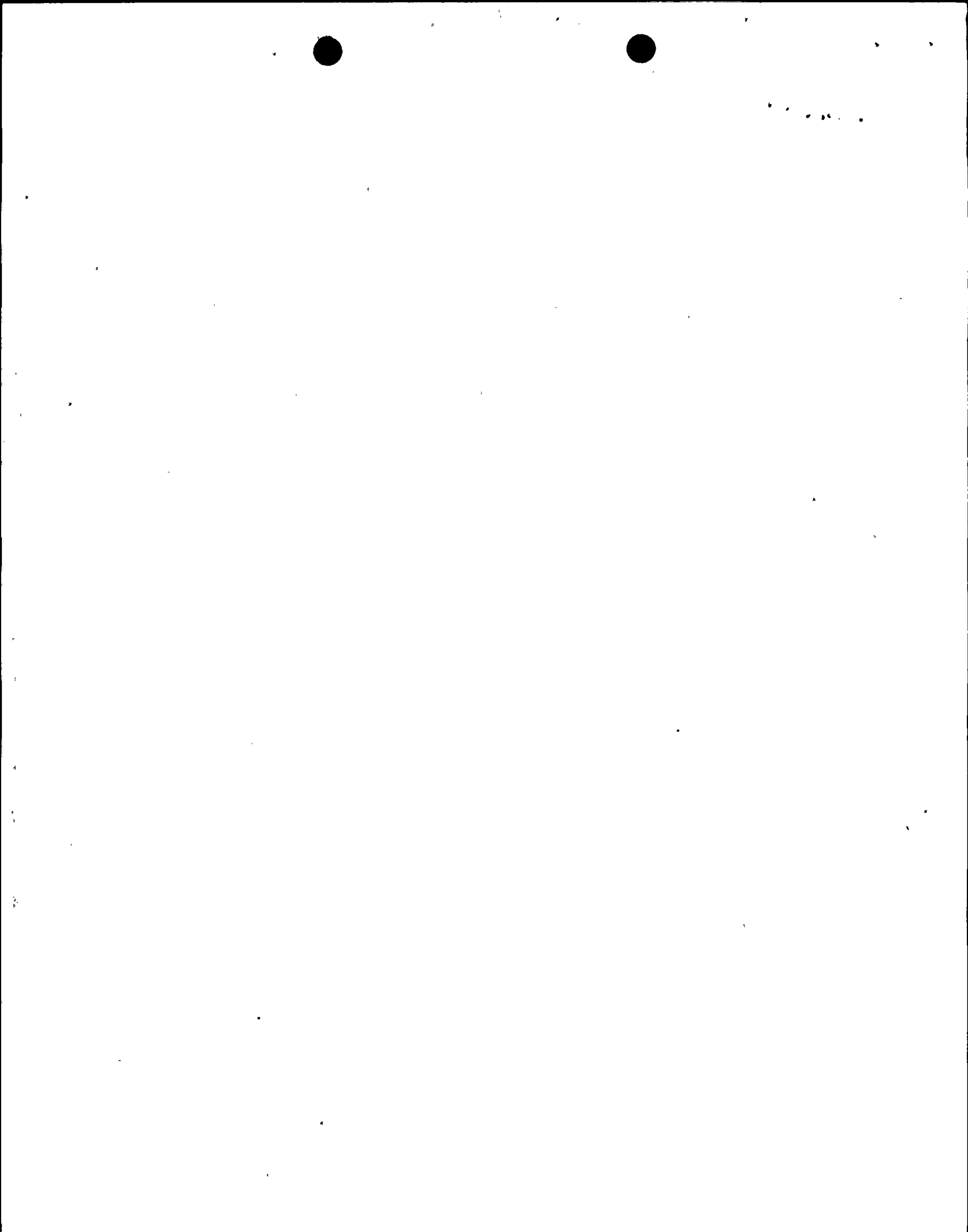
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B. Ralph Sylvia  
Executive Vice President  
Nuclear

August 18, 1994  
NMP1L 0850

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

RE:           Nine Mile Point Unit 1  
              Docket No. 50-220  
              DPR-63

              Nine Mile Point Unit 2  
              Docket No. 50-410  
              NPF-69

**Subject:**     *Request to use ASME Code Cases N-416-1 and N-498-1*

Gentlemen:

Section 50.55a (a)(3) of 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

In accordance with 10 CFR 50.55a (a)(3), Niagara Mohawk requests authorization to use ASME Code Case N-416-1, "Alternate Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2, and 3, Section XI, Division 1," and Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems, Section XI, Division 1," in the Nine Mile Point Unit 1 and Unit 2 Inservice Inspection Programs. Code Cases N-416-1 and N-498-1 have been approved by ASME Code Committee but are not currently published in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1."

Code Cases N-416 and N-498 are currently authorized for use by the Commission (i.e., both are published in RG 1.147). Code Case N-416 allows alternate pressure testing methods for welded repairs or installation of replacement items for Class 2 systems. Specifically, Code Case N-416 permits the use of a system leakage test in lieu of performing a hydrostatic pressure test. Code Case N-416-1 extends this Code Case to include Class 1 and 3 systems. Code Case N-498 allows alternate testing methods to be used for the 10-year hydrostatic pressure test of Class 1 and 2 systems. Specifically, Code Case N-498 permits the use of an inservice leakage test in lieu of a hydrostatic pressure test when performing the required 10-year pressure test. Code Case N-498-1 extends the use of this alternate test method to Class 3 systems.

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Niagara Mohawk requests authorization to use Code Case N-416-1 for both NMP1 and NMP2. Code Committee approval indicates that the use of Code Case N-416-1 will provide an acceptable level of safety and quality when applied to pressure testing at both NMP1 and NMP2. Consequently, the proposed Code alternative (Code Case N-416-1) meets the requirement of 10 CFR 50.55a (a)(3)(i) in that an acceptable level of quality and safety is maintained.

Beginning in September 1994, Niagara Mohawk plans to replace substantial portions of the Nine Mile Point Unit 2 Service Water System piping to improve system performance. The majority of the piping will be installed prior to Refuel Outage 4 with the final system tie-ins to be completed by the end of the outage. Because Code Case N-416 does not currently apply to Class 3 systems, hydrostatic pressure testing would be required following installation of the service water piping (a Class 3 system). To conduct hydrostatic pressure testing on the replacement piping, (i.e., testing performed at 1.25 times design pressure) a special test set-up involving temporary installation of pumps, valving and electrical supplies and development of engineering documents and procedures would be required. Also, the installation of the final Service Water System tie-ins are expected to consume the entire outage window currently allocated for the Service Water System. Hydrostatic pressure testing would extend the allotted system window and consequently, extend the outage. Niagara Mohawk estimates that performing inservice leakage tests in lieu of hydrostatic pressure tests would reduce the testing time, and therefore the outage length, by approximately 3 days resulting in an estimated savings of \$700,000. In addition, avoided costs associated with the special test set-up are estimated at \$100,000. Therefore, proposed Code alternative (Code Case N-416-1), as it relates to Nine Mile Point Unit 2, also meets the requirement of 10 CFR 55a (a)(3)(ii) in that hydrostatic pressure testing of Class 1 and 3 systems would result in an economic hardship without a compensating increase in the level of quality and safety.

As noted above, replacement of the Service Water System piping is scheduled to begin in early September. Knowledge of the Code testing which will be required will have a direct impact on how Niagara Mohawk proceeds with construction. The choice of a Code testing requirement will affect how the design documents are generated and the construction schedule. Therefore, Niagara Mohawk requests authorization to use Code Case N-416-1 for NMP2 by October 7, 1994 to assure that the piping will meet the required testing requirements. Niagara Mohawk also requests authorization to use N-416-1 for NMP1 by October 7, 1994 to maintain consistency between the NMP1 and NMP2 inspection plans and for the potential benefit for the upcoming NMP1 outage scheduled for early 1995.

Niagara Mohawk requests authorization to use Code Case N-498-1 for both NMP1 and NMP2. Code Committee approval indicates that the use of Code Case N-498-1 will provide an acceptable level of safety and quality when applied to pressure testing at both NMP1 and



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NMP2. Consequently, the proposed Code alternative (Code Case N-498-1) meets the requirement of 10 CFR 50.55a (a)(3)(i) in that an acceptable level of quality and safety is maintained.

Niagara Mohawk is currently developing the schedule for Code required First and Second Interval 10-year hydrostatic testing on Class 3 systems at NMP2 and NMP1, respectively. Depending on the schedule and whether authorization of this Code Case is granted, testing could begin as early as January 1995. Based on the man-hours required to perform hydrostatic testing on Class 3 systems during the First 10-year Interval at NMP1, Niagara Mohawk estimates that the use of Code Case N-498-1 would result in a savings of over \$250,000 per 10-year inspection. Over the lifetime of both plants, NMP1 would save approximately \$750,000 (3 remaining 10-year inspections x \$250,000) and NMP2 would save \$1,000,000 (4 remaining 10-year inspections x \$250,000). Therefore, proposed Code alternative (Code Case N-498-1) also meets the requirement of 10 CFR 50.55a (a)(3)(ii) in that hydrostatic pressure testing of Class 3 Systems every 10 years would result in an economic hardship without a compensating increase in quality or safety.

Niagara Mohawk requests authorization to use Code Case N-498-1 by November 1, 1994 for both NMP1 and NMP2. Authorization by this date will provide Niagara Mohawk sufficient time to make required test and visual examination procedure changes prior to January 1995.

Very truly yours,



B. Ralph Sylvia

Executive Vice President - Nuclear

JMT/lmc

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