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 BYRAM, R.G.                      Pennsylvania Power & Light Co.  
 RECIP. NAME                      RECIPIENT AFFILIATION  
 MILLER, C.L.                      Project Directorate I-2

SUBJECT: Forwards Relief Request LRR-24 from hydrotesting following repairs to feedwater sys scheduled to be completed during 7th refueling & insp outage for Unit 1 to begin in Sept 1993. Basis for relief & alternate provisions encl.

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**Pennsylvania Power & Light Company**

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Robert G. Byram  
Senior Vice President-Nuclear  
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Director of Nuclear Reactor Regulation  
Attention: Mr. C. L. Miller, Project Director  
Project Directorate I-2  
Division of Reactor Projects  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION  
REQUEST FOR ONE TIME RELIEF FROM  
HYDRO TEST - RELIEF REQUEST NO. 1RR-24  
PLA-3965 FILES R41-2,A30-1

Docket Nos. 50-387  
and 50-388

Dear Mr. Miller:

The purpose of this letter is to request a one time relief from hydrotesting following repairs to the feedwater system which are scheduled to be completed during the 7th Refueling and Inspection Outage for Unit 1. The outage is scheduled to begin in September, 1993. The basis for relief and alternate provisions are attached.

We request your approval of this relief request by July 1, 1993.

If you have any questions, please contact Mr. C.T. Coddington at (215) 774-7915.

Very truly yours,

Attachment

cc: NRC Document Control Desk (original)  
NRC Region I  
Mr. G. S. Barber, NRC Sr. Resident Inspector - SSES  
Mr. R. Clark, NRC Sr. Project Manager - Rockville

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RELIEF REQUEST NO. 1RR-24

I. IDENTIFICATION OF COMPONENTS AND IMPRACTICAL CODE REQUIREMENTS

ASME Section XI, 1980 Edition incorporating Winter 1980 addenda, subparagraph IWA-4400 (a) Pressure Test, states that". . . repairs (or replacements) by welding on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000."

During the Unit 1 seventh refueling outage, scheduled to commence on September 11, 1993, PP&L plans to replace a portion of Class 1 Feedwater piping. This replacement is a result of pipe wall thinning identified under the PP&L Erosion/Corrosion Program. The replaced section of piping can not be isolated from the reactor vessel in order to perform a localized hydrostatic pressure test. In lieu of the performance of a localized hydrostatic pressure test, a hydrostatic pressure test of the entire Class 1 pressure boundary would be required in order to meet the Code requirement.

The Class 1 hydrostatic pressure test requires significant alterations of plant systems. These alterations include:

- Disabling of plant instrumentation
- Gagging of safety relief valves & disabling of vessel overpressure protection
- Defeating of permissive/interlocks associated with safety related valves

In lieu of performing a localized hydrostatic test or an entire Class 1 pressure boundary hydrostatic test, a system operating leak test at normal operating pressure is proposed to be performed. The performance of a system operating leakage test in lieu of a hydrostatic pressure test at 110% of operating pressure along with the pre and post weld surface and volumetric NDE and pre-service inspection will provide assurance of the integrity of the welds and does not increase the risk of having an unisolatable leak.

II. BASIS FOR RELIEF

Performance of the Class 1 hydrostatic pressure test requires the reactor and related systems to be placed in an off-normal configuration, challenging control room operator's ability to respond to transients. Plant instrumentation is disabled, a significant portion of the system's depressurization capability is removed from service, and safety system permissives/interlocks are defeated to achieve the required test configuration.

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ASME Code Committees have performed studies regarding the benefits of performing system hydrostatic pressure tests at 110% of operating pressure vs. system operating leakage tests at normal operating pressure for both repairs/replacements and ten year inspection interval requirements. These studies resulted in the issuance of Code Cases N-298 and N-416.

Code Case N-498, Alternative Rules for 10 Year Hydrostatic Pressure Testing for Class 1 and 2 Systems, permits use of a system leakage test in lieu of the 10 year hydrostatic test.

Code Case N-416, Alternative Rules for Hydrostatic Testing of Repairs or Replacements, currently only applies to Class 2 Systems but recognizes that a piping/component hydrostatic pressure may be deferred without significantly impacting the safety of the system.

In addition to the above, the Code Committee is actively addressing the elimination of hydrostatic pressure tests for ASME Class 1, 2, & 3 system and components in their entirety via Code Cases, Revisions to Code Cases, and Code revisions.

### III. ALTERNATIVE PROVISIONS

Alternate provisions for performing the hydrostatic pressure test required by IWA-4400 (a) of the ASME Section XI Code shall consist of:

- 1) All required pre and post weld surface and volumetric NDE shall be performed in accordance with the original construction code, ASME Section III, 1971 Edition including Addenda through Winter of 1972.
- 2) Pre-service inspection (baseline) of the replacement welds shall be performed in accordance with ASME Section XI, 1980 Edition through Winter of 1980 Addenda.
- 3) Prior to return to service, a VT-2 visual examination shall be performed in conjunction with a system leakage test at normal operating pressure and temperature (1WB-5221).