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SUBJECT: Forwards relief request RR-16 from performing torque/tension test once each interval to assure leak tight integrity based upon hardship & requirements of ASME Section XI,1992 Edition,1992 Addenda,Subsection IWE.

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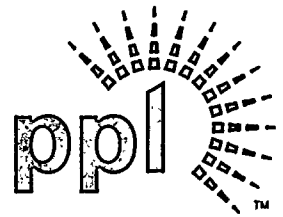
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**SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED RELIEF REQUEST NO. RR-16 TO
THE FIRST 10-YEAR PRIMARY CONTAINMENT
INSERVICE INSPECTION PROGRAM FOR
SUSQUEHANNA SES UNITS 1 & 2**

PLA-4953

FILE R41-2

Docket Nos. 50-387 and 50-388

The purpose of this letter is to request relief pursuant to the requirements of 10 CFR 50.55a(a)(3)(ii) based upon hardship and the requirements of ASME Section XI, 1992 Edition, 1992 Addenda, Subsection IWE, Class MC, Paragraph IWE-2500 (a), Examination Category E-G, Item number E8.20 requires that pressure retaining bolted connections that have not been disassembled and reassembled during the interval, be subjected to a torque/tension test once each interval to assure leak tight integrity. Relief is requested from performing the torque/tension test once each interval and permission is sought to allow verification of the leak tight integrity of bolted connections through our approved 10 CFR 50 Appendix J Primary Containment Leakage Testing Program and a VT-1 visual examination. We believe that the requirement to torque/tension bolted connections to assure leak tight integrity places an undue hardship on the Susquehanna Steam Electric Station without providing additional safety assurance while adding additional exposure and outage duration. We believe that the alternative method(s) described will provide an adequate level of safety assurance while meeting the intent for regular inspections as prescribed in the ASME Code.

We request that this relief request be approved by January 15, 1999, in order to support the Unit 2 9th Refuel Outage which is scheduled to begin in March 1999. Should you have any questions, please contact C. T. Coddington at (717) 542-3294.

Sincerely,

R. G. Byram

Attachment

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A047

copy: NRC Region I
Mr. K. Jenison, NRC Sr. Resident Inspector
Mr. V. Nerses, NRC Sr. Project Manager

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RELIEF REQUEST RR-16

I. RELIEF REQUEST APPLICABILITY

- A. Unit(s): 1 and 2
B. Code Examination Category: IWE E-G
C. Code Item Number: E8.20
D. Code Reference: ASME, Section XI, 1992 Edition, IWE-2500 (a),
Examination and Pressure Test Requirements

II. IDENTIFICATION OF COMPONENTS

This relief request applies to bolted connections of ASME Code Class MC components for both Units 1 and 2.

III. REQUIREMENTS FROM WHICH RELIEF ARE REQUESTED

ASME Section XI, 1992 Edition, 1992 Addenda, Examination Category E-G, Item Number E8.20, requires that pressure retaining bolted connections that have not been disassembled and reassembled during the interval, be subjected to a torque/tension test once each interval to assure leak tight integrity. Relief is requested from performing the torque/tension tests once each interval and permit verification of the leak tight integrity of bolted connections with the 10 CFR 50, Appendix J, Primary Containment Leakage Testing Program, Type B tests and a VT-1 visual examination in accordance with Examination Category E-G, Item No. E8.10.

IV. BASIS FOR RELIEF

Performing a torque/tension test requires that the bolted connection be retorqued or retensioned. This activity is considered maintenance and requires a 10 CFR 50, Appendix J, Type B test. The Type B test alone indicates the adequacy of the bolt torque or tension to maintain leakage within acceptable limits. Performance of a Type B leakage test and a visual examination is sufficient to demonstrate that the design function is met. As stated in the NRC/NEI/EPRI meeting notes from H. Asher to G. Bagchi dated January 13, 1998 in Item 8, "For the pressure-unseating bolted connections, it is necessary to confirm that the bolt's pretension is maintained. If their adequacy is verified during Appendix J testing or during routine disassembling and reassembling, the staff believes that additional torque testing as per Table IWE-2500 (E8.20) is not needed."

V. ALTERNATE PROVISIONS

The leak tight integrity of bolted connections that have not been disassembled during the interval will be verified with the 10 CFR 50, Appendix J, Primary Containment Leakage Testing Program, Type B Tests and a VT-1 visual examination of the exposed surfaces in accordance with Examination Category E-G, Item No. E8.10.