

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8606030248    DOC. DATE: 86/05/28    NOTARIZED: NO    DOCKET #  
 FACIL: 50-335 St. Lucie Plant, Unit 1, Florida Power & Light Co.    05000335  
 50-389 St. Lucie Plant, Unit 2, Florida Power & Light Co.    05000389  
 AUTH. NAME    AUTHOR AFFILIATION  
 WOODY, C. O.    Florida Power & Light Co.  
 RECIP. NAME    RECIPIENT AFFILIATION  
 THADANI, A. C.    PWR Project Directorate B

SUBJECT: Requests NRC approval to use ASME Boiler & Pressure Vessel Code Case 4-416, "Alternative Rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping," to satisfy requirements of ASME Code, Section XI, IWA-4400. Fee paid.

DISTRIBUTION CODE: A047D    COPIES RECEIVED: LTR 1 ENCL 1    SIZE: 3  
 TITLE: OR Submittal: Inservice Inspection/Testing

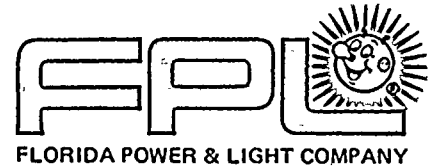
NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PWR-B EB	1 1	PWR-B PDB PD 01	5 5
	TOURIGNY, E	1 1		
INTERNAL:	ADM/LFMB	1 0	ELD/HDS2	1 0
	NRR BWR ADTS	1 1	NRR BWR EB	1 1
	NRR PWR-A ADTS	1 1	NRR PWR-A EB	1 1
	NRR PWR-B ADTS	1 1	NRR PWR-B EB	1 1
	NRR/DSRO/EIB	1 1	NRR/TAMB	1 1
	<u>REG FILE</u> 04	1 1	RGN2	1 1
EXTERNAL:	24X	1 1	LPDR	03 1 1
	NRC PDR 02	1 1	NSIC	05 1 1

*Rec'd w/check \$15000*

REPRODUCED FROM THE NATIONAL ARCHIVES AT COLLEGE PARK, MARYLAND  
REF ID: A64087

ITEM NO.	DATE	DESCRIPTION	QUANTITY	UNIT	PRICE	TOTAL
1	1	WATER	1	UNIT	1.00	1.00
2	1	ICE	1	UNIT	1.00	1.00
3	1	TEA	1	UNIT	1.00	1.00
4	1	COFFEE	1	UNIT	1.00	1.00
5	1	SAFETY	1	UNIT	1.00	1.00
6	1	STATIONERY	1	UNIT	1.00	1.00
7	1	REPAIRS	1	UNIT	1.00	1.00
8	1	UTILITIES	1	UNIT	1.00	1.00
9	1	TRAVEL	1	UNIT	1.00	1.00
10	1	INSURANCE	1	UNIT	1.00	1.00
11	1	LEGAL	1	UNIT	1.00	1.00
12	1	ENTERTAINMENT	1	UNIT	1.00	1.00
13	1	RECREATION	1	UNIT	1.00	1.00
14	1	SPORTS	1	UNIT	1.00	1.00
15	1	ARTS	1	UNIT	1.00	1.00
16	1	SCIENCE	1	UNIT	1.00	1.00
17	1	TECHNOLOGY	1	UNIT	1.00	1.00
18	1	HEALTH	1	UNIT	1.00	1.00
19	1	ENVIRONMENT	1	UNIT	1.00	1.00
20	1	ENERGY	1	UNIT	1.00	1.00
21	1	TRANSPORTATION	1	UNIT	1.00	1.00
22	1	AVIATION	1	UNIT	1.00	1.00
23	1	SPACE	1	UNIT	1.00	1.00
24	1	DEFENSE	1	UNIT	1.00	1.00
25	1	ARMED FORCES	1	UNIT	1.00	1.00
26	1	NAVY	1	UNIT	1.00	1.00
27	1	ARMY	1	UNIT	1.00	1.00
28	1	AIR FORCE	1	UNIT	1.00	1.00
29	1	COAST GUARD	1	UNIT	1.00	1.00
30	1	SPACELAND	1	UNIT	1.00	1.00
31	1	AMERICAN AIR FORCE	1	UNIT	1.00	1.00
32	1	NAVY	1	UNIT	1.00	1.00
33	1	ARMY	1	UNIT	1.00	1.00
34	1	AIR FORCE	1	UNIT	1.00	1.00
35	1	COAST GUARD	1	UNIT	1.00	1.00
36	1	SPACELAND	1	UNIT	1.00	1.00
37	1	AMERICAN AIR FORCE	1	UNIT	1.00	1.00
38	1	NAVY	1	UNIT	1.00	1.00
39	1	ARMY	1	UNIT	1.00	1.00
40	1	AIR FORCE	1	UNIT	1.00	1.00
41	1	COAST GUARD	1	UNIT	1.00	1.00
42	1	SPACELAND	1	UNIT	1.00	1.00
43	1	AMERICAN AIR FORCE	1	UNIT	1.00	1.00
44	1	NAVY	1	UNIT	1.00	1.00
45	1	ARMY	1	UNIT	1.00	1.00
46	1	AIR FORCE	1	UNIT	1.00	1.00
47	1	COAST GUARD	1	UNIT	1.00	1.00
48	1	SPACELAND	1	UNIT	1.00	1.00
49	1	AMERICAN AIR FORCE	1	UNIT	1.00	1.00
50	1	NAVY	1	UNIT	1.00	1.00
51	1	ARMY	1	UNIT	1.00	1.00
52	1	AIR FORCE	1	UNIT	1.00	1.00
53	1	COAST GUARD	1	UNIT	1.00	1.00
54	1	SPACELAND	1	UNIT	1.00	1.00
55	1	AMERICAN AIR FORCE	1	UNIT	1.00	1.00
56	1	NAVY	1	UNIT	1.00	1.00
57	1	ARMY	1	UNIT	1.00	1.00
58	1	AIR FORCE	1	UNIT	1.00	1.00
59	1	COAST GUARD	1	UNIT	1.00	1.00
60	1	SPACELAND	1	UNIT	1.00	1.00



MAY 28 1988

L-86-218

Office of Nuclear Reactor Regulation  
Attention: Ashok C. Thadani  
PWR Project Directorate #8  
Division of PWR Licensing - B  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Thadani:

Re: St. Lucie Units 1 and 2  
Docket Nos. 50-335 and 50-389  
Alternative Rules for Hydrostatic Testing  
of Repair or Replacement of Class 2 Piping  
Section XI, Division 1

Florida Power & Light Company requests NRC approval to use ASME Boiler and Pressure Vessel Code Case N-416, "Alternative Rules for Hydrostatic Testing of Repair or Replacement of Class 2 Piping" at St. Lucie Units 1 and 2, to satisfy the inservice Pressure Testing Requirements of the ASME Code, Section XI, IWA-4400, as permitted by 10 CFR 50.55a(a)(3). A copy of Code Case N-416 is attached.

For repair or replacement of Class 2 piping that cannot be isolated by existing valves or that require securing safety or relief valves for isolation, the pressure test required by IWA-4400 will be deferred until the next regularly scheduled system hydrostatic tests (IWC-5000), with the repaired or replaced piping subject to the following conditions:

- (a) Prior to or immediately upon return to service, a visual (VT-2) examination for leakage shall be conducted during a system functional test or during a system inservice test in the repaired or replaced portion of the piping system.
- (b) The repair or replacement welds shall be examined in accordance with IWA-4000 and IWA-7000 using volumetric examination methods (IWA-2230) for full penetration welds or surface examination methods (IWA-2220) for partial penetration welds.

The ASME Boiler and Pressure Vessel Code Committee approved Code Case N-416 on December 5, 1984.

8606030248 860528  
PDR ADDOCK 05000335  
PDR

Rec'd w/CHCIL \$150.00

A047  
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HP5:1

The Nuclear Regulatory Commission approved this Code Case on April 15, 1985, and per discussion with your staff, this Code Case is scheduled to be included in the next revision (Rev. 5) of NRC Regulatory Guide 1.147.

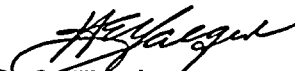
In the NRC letter of May 1, 1986 regarding use of Code Case N-416 for Turkey Point Plant, Units 3 and 4, (Ref: TAC Numbers 61128 and 61129) the staff acknowledges that Code Case N-416 is an acceptable Code Case which is approved as written with no additional requirements other than those specified in the Code Case. NRC approval letter is attached.

Performance of these tests would result in considerable exposure of personnel to radiation and significantly increase the risk of component damage or failure without compensating increase in the level of quality and safety.

Based on the above information, Florida Power & Light Company requests approval to implement Code Case N-416 during the First Ten-Year Inspection Interval for St. Lucie Unit 1, which began on December 21, 1976 and ends on February 11, 1988 and St. Lucie Unit 2, which began on August 8, 1983 and ends on August 8, 1993.

Enclosed please find check in the amount of \$150.00

Very truly yours,

  
for C. O. Woody  
Group Vice President  
Nuclear Energy

COW/PWH/ELA/cac

Attachments: 1) ASME Boiler and Pressure Vessel Code Case N-416  
2) NRC Approval Letter of Code Case N-416 for PTP 3 & 4

cc: Dr. J. Nelson Grace, Regional Administrator,  
Region II, USNRC  
Harold F. Reis, Esquire

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: December 5, 1964

See Numeric Index for expiration  
and any reaffirmation dates.

Case N-416  
Alternative Rules for Hydrostatic Testing of Repair or  
Replacement of Class 2 Piping  
Section XI, Division 1

E *Inquiry:* For Section XI, Division 1, repair or replacement of Class 2 piping that cannot be isolated by existing valves or that requires securing safety or relief valves for isolation, may the system hydrostatic test required by IWA-4400 (IWA-4210 in earlier Code editions) be deferred until the next regularly scheduled system hydrostatic test (IWC-5000) for that system?

E *Reply:* It is the opinion of the Committee that the system hydrostatic test required by IWA-4400 (IWA-4210 in earlier Code editions) for repair or replacement

of Class 2 piping that cannot be isolated by existing valves or that requires securing safety or relief valves for isolation may be deferred until the next regularly scheduled system hydrostatic tests (IWC-5000), provided both of the following conditions are met.

(a) Prior to or immediately upon return to service, a visual examination (VT-2) for leakage shall be conducted during a system functional test or during a system inservice test in the repaired or replaced portion of the piping system.

(b) The repair or replacement welds shall be examined in accordance with IWA-4000 and IWA-7000 using volumetric examination methods (IWA-2230) for full penetration welds or surface examination methods (IWA-2220) for partial penetration welds.