

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8606030248 DDC 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 8

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.

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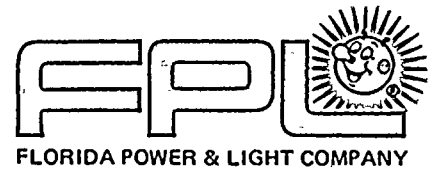
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1. The purpose of this report is to provide information on the results of the investigation conducted by the FBI on the subject of the above-captioned case. The investigation was conducted in accordance with the instructions of the Department of Justice and the Federal Bureau of Investigation.

2. The investigation was conducted in accordance with the instructions of the Department of Justice and the Federal Bureau of Investigation. The results of the investigation are as follows:

ITEM	DATE	DESCRIPTION	REMARKS	INITIALS	SIGNATURE
1	10/10/50	RECEIVED	10/10/50		
2	10/10/50	RECEIVED	10/10/50		
3	10/10/50	RECEIVED	10/10/50		
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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.

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PDR ADDOCK 05000335
PDR

Rec'd w/CHCIL \$150.00

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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,


C. O. Woody
for 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, 1984

*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.