

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9203180267      DOC. DATE: 92/03/10      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  
 SAGER, D.A.      Florida Power & Light Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Requests approval to incorporate Code Case N-498 re alternative rules for 10 yr hydrostatic pressure testing for Class 1 & 2 sys for use in 10 yr ISI programs. Use of sys reduces need for special sys alignments.

DISTRIBUTION CODE: A047D      COPIES RECEIVED: LTR 1 ENCL 1      SIZE: 2  
 TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTR	ENCL		LTR	ENCL
	PD2-2 LA	1	0	PD2-2 PD	1	1
	NORRIS, J	2	2			
INTERNAL:	ACRS	6	6	NRR/DET/ECMB 9H	1	1
	NRR/DET/EMEB 7E	1	1	NUDOCS-ABSTRACT	1	1
	OC/LFMB	1	0	OGC/HDS3	1	0
	<del>REG FILE</del> 01	1	1	RES MILLMAN, G	1	1
	RES/DSIR/EIB	1	1			
EXTERNAL:	EG&G BROWN, B	1	1	EG&G RANSOME, C	1	1
	NRC PDR	1	1	NSIC	1	1

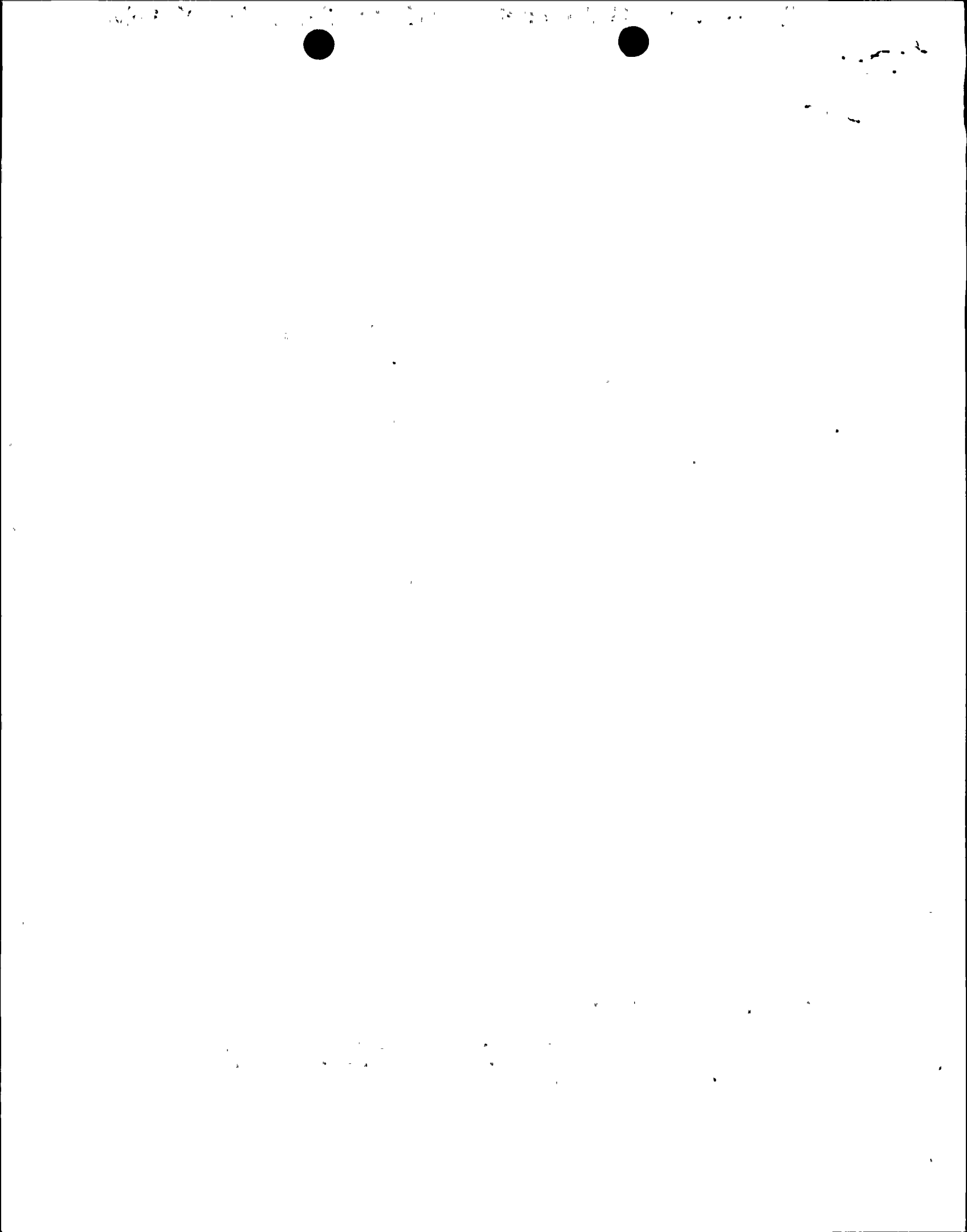
NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR 22 ENCL 19

*MAY*

R  
I  
D  
S  
/  
A  
D  
D  
S  
  
R  
I  
D  
S  
/  
A  
D  
D  
S





March 10, 1992

L-92-60  
10 CFR 50.4  
10 CFR 50.55a

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

Gentlemen:

RE: St. Lucie Units 1 and 2  
Docket No. 50-335 and 50-389  
ASME Code Case N-498 - Request for Use

Pursuant to 10 CFR 50.55a(a)(3), Florida Power and Light Company requests approval to incorporate Code Case N-498, *Alternative Rules for 10 Year Hydrostatic Pressure Testing for Class 1 and 2 Systems, Section XI, Division 1*, for use in the St. Lucie Unit 1 and 2 Ten Year Inservice Inspection Programs.

This Code Case is an alternative to the 10 year hydrostatic test presently required by ASME Section XI for Class 1 and 2 systems. Use of this alternative reduces the need for special system alignments and temporary system alterations to conduct hydrostatic tests. Temporary system alterations include removal of check valve internals, installation of temporary jumpers, and in some instances the blanking off of pressure relief devices. The preparation for and performance of the Ten Year Hydrostatic Tests involves excessive cost, man-hours, and man-REM with little or no compensating increase in the level of quality or safety. A copy of the Code Case is attached for your information.

Code Case approval is requested to support its use in the upcoming St. Lucie Unit 2 outage scheduled to begin April 21, 1992.

Please contact us if there are any questions about this submittal.

Very truly yours,

D. A. Sager  
Vice President  
St. Lucie Plant

DAS/GRM/kw

cc: Stewart D. Ebnetter, Regional Administrator, Region II, USNRC  
Senior Resident Inspector, USNRC, St. Lucie Plant

DAS/PSL #635-92

160151  
an FPL Group company

9203180267 920310  
PDR ADDCK 05000335  
PDR  
G

CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: May 13, 1991

See Numerical Index for expiration  
and any reaffirmation dates.

Case N-498  
Alternative Rules for 10-Year Hydrostatic Pressure  
Testing for Class 1 and 2 Systems  
Section XI, Division 1

*Inquiry:* What alternative rules may be used in lieu of those required by Section XI, Division 1, Table IWB-2500-1, Category B-P, and Table IWC-2500-1, Category C-H, for the 10-year hydrostatic pressure test?

*Reply:*

(a) It is the opinion of the Committee that as an alternative to the 10-year hydrostatic pressure test required by Table IWB-2500-1, Category B-P, the following rules shall be used.

(1) A system leakage test (IWB-5221) shall be conducted at or near the end of each inspection interval, prior to reactor startup.

(2) The boundary subject to test pressurization during the system leakage test shall extend to all Class 1 pressure retaining components within the system boundary.

(3) Prior to performing VT-2 visual examination, the system shall be pressurized to nominal operating pressure for at least 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during the performance of the VT-2 visual examination.

(4) Test temperatures and pressures shall not exceed limiting conditions for hydrostatic test curve as contained in the plant Technical Specifications.

(5) The VT-2 visual examination shall include all components within the boundary identified in (2) above.

(b) It is also the opinion of the Committee that, as an alternative to the 10-year hydrostatic pressure test required by Table IWC-2500-1, Category C-H, the following rules shall be used.

(1) A system pressure test shall be conducted at or near the end of each inspection interval or during the same inspection period of each inspection interval of Inspection Program B.

(2) The boundary subject to test pressurization during the system pressure test shall extend to all Class 2 components included in those portions of systems required to operate or support the safety system function up to and including the first normally closed valve (including a safety or relief valve) or valve capable of automatic closure when the safety function is required.

(3) Prior to performing VT-2 visual examination, the system shall be pressurized to nominal operating pressure for a minimum of 4 hours for insulated systems and 10 minutes for noninsulated systems. The system shall be maintained at nominal operating pressure during the performance of the VT-2 visual examination.

(4) The VT-2 visual examination shall include all components within the boundary identified in (2) above.