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 JOHNSON, A.R. Project Directorate I-3

SUBJECT: Requests relief from provisions of ASME hydrostatic tests on
 Class 2 & 3 svc water sys components, in connection w/code
 repair, replacement or mod activity.

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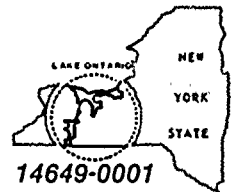
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1. *Chlorophyll a* and *Chlorophyll b* were determined by the method of Arar and Collins (1971) using a Shimadzu 1601 UV-Visible Spectrophotometer.

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ROBERT C. MECREDY
Vice President
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January 12, 1993

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U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-3
Washington, D.C. 20555

Subject: Quality Assurance Manual Revision, Appendix B
Ginna Nuclear Power Plant Inservice Inspection
ASME Section XI Required Examinations
R.E. Ginna Nuclear Power Plant
Docket No. 50-244

Dear Mr. Johnson:

The purpose of this letter is to request relief from the provisions of Code hydrostatic tests on Class 2 and 3 service water system components, in connection with a Code "Repair, Replacement or Modification" activity. Justification and a proposed alternative is included in attachment 1 to this letter identified as Relief Request No. 14.1.

In lieu of hydrostatic testing, relative to a Code Repair, Replacement or Modification activity, the attached relief request would require an inservice or functional test. Previously approved Relief Request No. 14 provided relief for all pressure retaining components within the Class 3 portion of the service water system. Under that relief request pressure retaining components within the operational boundary receive an inservice test at operating pressure and an associated VT-2 examination within each period of the 10-year interval. In addition, Code Case N-498 has been approved for use as specified in Regulatory Guide 1.147, Revision 9, dated April 1992. Code Case N-498 provides alternative rules which 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 testing for class 1 & 2 systems. Since Relief Request No. 14 provided relief for the 10-year inservice inspection hydrostatic testing requirements of the service water system and Code Case N-498 provides alternative rules for the 10-year hydrostatic testing for class 1 and 2 components, Relief Request No. 14.1 is proposed to be consistent with the basis of those established alternatives. To further ensure the integrity and safety of the service water system, augmented NDE will be performed on all welds that are applicable and accessible.

Relief Request No. 14.1 described in Attachment 1 also provides guidance concerning service water system copper soldered joints. The proposed alternative method for hydrostatic testing includes an

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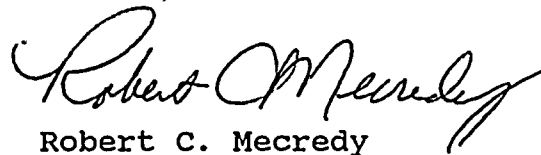
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Inservise or functional test and a visual examination of all applicable and accessible soldered joints. The visual examination method proposed would be performed in accordance with ASME Section XI, IWA-2211.

Very truly yours,


Robert C. Mecredy

GAL/251
Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14D1)
Project Directorate I-3
Washington, D.C. 20555

U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Ginna Senior Resident Inspector



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ATTACHMENT 1

RELIEF REQUEST NO. 14.1

I. Component for Which Relief is Requested:

Service Water System, alternative rules for hydrostatic testing of Code Repairs, Replacements or Modifications to pressure retaining Class 2 and 3 components.

II. ASME Requirement from Which Relief is Requested:

Hydrostatic testing of Repairs, Replacements or Modifications on Class 2 and 3 service water system components is required by IWA-4400 which specifies that hydrostatic testing shall be performed to IWC-5222(a) and IWD-5223(a). The system hydrostatic test pressure shall be at least 1.10 times the system pressure P_{sv} for systems with design temperature of 200°F or less, and at least 1.25 times the system pressure P_{sv} for systems with design temperature above 200°F. The system pressure P_{sv} shall be the lowest pressure setting among the number of safety or relief valves provided for overpressure protection within the boundary of the system to be tested. For systems (or portions of systems) not provided with safety or relief valves, the system design pressure P_d shall be substituted for P_{sv} .

Rochester Gas and Electric maintains that the applicable Code requirements for Repair, Replacement or Modification hydrostatic testing on Class 2 and 3 service water system components is impractical. For Class 3 components, hydrostatic testing is impractical, since the system design would dictate the use of an open-ended test. The portion of the service water system downstream of the heat exchangers is also open-ended and cannot be hydrostatically tested. The remaining sections of the Class 2 and 3 service water system are isolable only by means of butterfly valves which were not designed to provide a leak-tight boundary. The Class 2 portion of the service water system is continuously monitored by the containment leakage detection systems. Sensitivity of these systems to service water leakage has been demonstrated to be on the order of a few gallons per hour.

The ample margin in cooling capacity inherently provided by the service water system design does not dictate the need for an essentially leak-tight boundary. Since the system is in constant operation, its integrity is continually monitored. Thorough inspection of the system utilizing a leakage examination and augmented NDE testing of Code Repairs, Replacements or Modifications is adequate to ensure that system safety or availability is maintained.

III. Proposed Alternate Method:

Pressure retaining Class 2 and 3 service water components that require hydrostatic testing for a Code Repair, Replacement or Modification shall be examined to the following if not exempted by IWA-4400(b) or IWA-7400 of ASME Section XI Code:

- a) Prior to or immediately upon return to service a visual examination (VT-2) for leakage shall be conducted during a system functional or inservice test at nominal operating pressure.
- b) Associated weld(s) 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 as applicable.

Pressure retaining Class 2 and 3 service water system components that require hydrostatic testing for a Code Repair, Replacement or Modification activity that involves soldering, shall be examined to the following if not exempted by IWA-4400(b) or IWA-7400 of ASME Section XI Code:

- a) Prior to or immediately upon return to service a visual examination (VT-2) for leakage shall be conducted during a system functional or inservice test at nominal operating pressure.
- b) A VT-1, visual examination method (IWA-2211), shall be performed to examine the applicable and accessible soldered connection(s) associated with the Repair, Replacement or Modifications.



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