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MECREDY,R.C. Rochester Gas & Electric Corp.
RECIP.NAME RECIPIENT AFFILIATION
JOHNSON,A.R.

SUBJECT: Requests relief from provisions of ASME Code,Section XI requirements for hydrostatic testing for welded repair & replacement activities on Class 3 portion of plant main steam sys.ISI program Relief Request 30 encl.

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ROBERT C. MECREDY
Vice President
Nuclear Operations

September 26, 1995

U.S. Nuclear Regulatory Commission
Document Control Desk
Attn: Allen R. Johnson
Project Directorate I-1
Washington, D.C. 20555

Subject: Ginna Station Inservice Inspection Program
ASME Section XI Required Examinations
Relief Request No. 30
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 the ASME Code, Section XI requirements for hydrostatic testing for welded repair and replacement activities on a Class 3 portion of the Ginna Station main steam system and as required by Appendix B of our Quality Assurance Manual. This relief request is made in accordance with the provisions of 10CFR50.55a(a)(3)(i). The basis for this relief request is consistent with the ASME Section XI safety philosophy espoused in pending Code Case N-416-1. We believe that the alternative examination and testing presented in this relief request provides the acceptable level of quality and safety required.

The activities for which this relief is being requested had been performed during the 1995 Ginna Station refueling outage without seeking prior relief. Two 1 1/2" drain valves were replaced by welding and the ASME-required hydrostatic testing was not performed. Instead, the alternative methods provided in this relief request were performed. The reason for the error was that the responsible organizations believed that the alternative methods granted by previous relief requests on certain Class 3 systems applied to all Class 3 systems.

Our corrective actions relative to this error are being pursued independently of this Relief Request.

Very truly yours,

Robert C. Mecredy

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Attachment

xc: Mr. Allen R. Johnson (Mail Stop 14B2)
Project Directorate I-1
Washington, D.C. 20555

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

US NRC Ginna Senior Resident Inspector

Relief Request No. 30

I. Components for which Relief is Requested:

The Class 3 portions of the Main Steam System, between the main steam isolation valve and the main steam non-return valve.

II. ASME Requirement from which Relief is Requested:

Relief is requested from the requirements specified in IWA-4400 and IWD-5223(a) of the 1986 Edition, no addenda.

Hydrostatic testing of repairs or replacements in Class 3 systems is required by IWA-4400.

The pressure testing rules of IWA-4400(a):

After repairs by welding on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000.

IWA-5000 specifies that hydrostatic testing shall be performed to IWD-5223(a).

IWA-5223(a) states in part the following:

The system hydrostatic test pressure shall be at least 1.25 times the system pressure P_{SV} for systems with Design Temperature above 200°F.

III. Basis:

Industry studies have shown that the hydrostatic pressure test specified in IWD-5223(a) is not a structural integrity test of the weld, but is in fact a leakage test performed at a high pressure. Using surface examination methods on the weld or volumetric examinations methods on a completed weld provide more comprehensive results in the determination of the integrity of the weld. In addition, a system inservice or functional test and VT-2 examination shall be performed on the completed welds.

IV. Proposed Alternate Method:

In lieu of performing the hydrostatic pressure test required by IWA-4400 for welded repairs or installation of replacement items in the Main Steam System (Class 3) by welding, the following examinations and tests shall be performed:

1. Though 1 1/2" size is excluded from ASME III examination, surface examination shall be performed in accordance with the methods and acceptance criteria of Subsection ND of the 1986 Edition of Section III for partial penetration fillet welds to include visual and MT examinations.

2. Prior to or immediately upon return to service, a VT-2 visual examination shall be performed in conjunction with a system inservice or functional test, in accordance with ASME Section XI, 1986 Edition article IWA-5000, at nominal operating pressure and temperature.

3. Use of this Case shall be documented on an NIS-2 Form.