

CATEGORY 1

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SUBJECT: Requests approval to use alternate to ASME Boiler & Pressure Vessel Code requirements for sys hydrostatic testing of class 1,2 & 3 sys.

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NOTES:Application for permit renewal filed. 05000400

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William R. Robinson
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Harris Nuclear Plant

MAR 20 1996

SERIAL: HNP-96-040

United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
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SHEARON HARRIS NUCLEAR POWER PLANT
DOCKET NO. 50-400/LICENSE NO. NPF-63
ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI
REQUEST FOR APPROVAL TO USE CODE CASE N-498-1

Gentlemen:

In accordance with 10 CFR 50.55a(a)(3), Carolina Power & Light (CP&L) Company requests approval for the Harris Nuclear Plant to use an alternative to the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code requirements for System Hydrostatic Testing of Class 1, 2, and 3 Systems. The requested alternative is delineated in ASME Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems" which was approved by the ASME committee on May 11, 1994, but has not yet been incorporated into Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1."

Code Case N-498, which has already been incorporated into Regulatory Guide 1.147, provided alternative rules for testing of Class 1 and 2 systems. Code Case N-498-1 extends these alternative rules to Class 3 systems as well. As noted in the NRC's evaluation of a request by the Brunswick Nuclear Plant for approval of Code Case N-498-1, the most common causes of failure in Code Class 3 systems are flow-accelerated corrosion (FAC), microbiologically induced corrosion (MIC), and General corrosion. The Harris Plant has a program for monitoring FAC, and guidance for the surveillance and documentation of MIC in raw water systems. Leakage from General corrosion is readily apparent to inspectors when performing a VT-2 inspection during system pressure tests.

Hydrostatic tests are historically difficult to perform, requiring unique system line-ups, special equipment installation, removal or gagging of pressure relief devices, and additional testing resources, resulting in potential extended outage duration and additional dose contrary to ALARA principles. The safety assurance provided by a slight increase in system pressure during a hydrostatic test may be offset or negated by these factors.

HNP is currently in the third period of its first ten year ISI interval, and is to complete all remaining inspections in its next refueling outage, currently scheduled to begin in March 1997. NRC approval is requested by September 1, 1996 to support the planning effort required for this outage.

Questions regarding this matter may be referred to Mr. T. D. Walt at (919) 362-2711.

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PDR ADDOCK 05000400
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Sincerely,

LSR/lsr

c: Mr. S. D. Ebnetter
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