B08j.1/78

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)
DISTRIBUTION FOR INCOMING MATERIAL 50--302

REC: ~~NRC~~ Mr. Robert W. Reid ORG: STEWART W P DOCDATE: 08/17/78
NRC FL PWR DATE RCVD: 08/21/78

DOCTYPE: LETTER NOTARIZED: YES COPIES RECEIVED
SUBJECT: LTR 3 ENCL 0
REQUEST THAT APPLICANT BE GRANTED RELIEF FROM A PROTION OF ASME SECTION XI CODE CONCERNING PRESSURE TESTING OF SYSTEMS FOLLOWING REPAIR BY WELDING ON THE PRESSURE RETAINING BOUNDARY OF COMPONENTS FOR UNIT #3. . . NOTARIZED 08/17/78.

PLANT NAME: CRYSTAL RIVER #3 REVIEWER INITIAL: XJM
DISTRIBUTOR INITIAL: ISM

********** DISTRIBUTION OF THIS MATERIAL IS AS FOLLOWS **********

GENERAL DISTRIBUTION FOR AFTER ISSUANCE OF OPERATING LICENSE.
(DISTRIBUTION CODE A001)

FOR ACTION: BR CHIEF ORB#4 BC**LTR ONLY(7)

INTERNAL:
REG FILE**LTR ONLY(1)
I & E**LTR ONLY(2)
HANAUER**LTR ONLY(1)
AD FOR SYS & PROJ**LTR ONLY(1)
REACTOR SAFETY BR**LTR ONLY(1)
EEB**LTR ONLY(1)
J. MCGOUGH**LTR ONLY(1)
NRC PDR**LTR ONLY(1)
OELD**LTR ONLY(1)
CORE PERFORMANCE BR**LTR ONLY(1
ENGINEERING BR**LTR ONLY(1)
PLANT SYSTEMS BR**LTR ONLY(1)
EFFLUENT TREAT SYS**LTR ONLY(1)

EXTERNAL:
LPDR'S
CRYSTAL RIVER, FL**LTR ONLY(1)
TERA**LTR ONLY(1)
NSIC**LTR ONLY(1)
ACRS CAT B**LTR ONLY(16)

DISTRIBUTION: LTR 40 ENCL 0 CONTROL NBR: [redacted]
SIZE: 3P

********** THE END **********

8003130850

Florida Power
CORPORATION

W. P. STEWART, DIRECTOR
POWER PRODUCTION

August 17, 1978

Mr. Robert W. Reid
Branch Chief
Operating Reactors Branch #4
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Florida Power Corporation
Crystal River Unit #3
Docket No. 50-302

Dear Mr. Reid:

The current Inservice Inspection Program at Crystal River Unit 3 is based on ASME Section XI, 1974 Edition through summer 1975 Addenda, for the period of 40 months following commercial operation. Pursuant to 10 CFR 50.55a (g) (6) (i), Florida Power Corporation filed on April 14, 1977 and November 21, 1977 written requests for relief from those portions of the ASME Section XI Code that we determined to be impractical for Crystal River Unit 3. As part of our waiver request, FPC submitted alternative test and inspection methods to be utilized in lieu of the ASME Section XI Code requirements determined to be impractical. We further stated that it should be recognized that it may not be possible in all cases for Florida Power Corporation to determine that an ASME Code requirement is impractical for our facility until all of the requirements have been implemented during an actual inservice inspection. We indicated at that time that we would advise you of any additional code requirements that are determined to be impractical for Crystal River Unit 3.

This letter is to advise you that FPC has determined that a portion of the ASME Section XI Code concerning pressure testing of systems following repair by welding on the pressure retaining boundary of components is impractical for CR #3. Specifically, Florida Power Corporation requests relief from Section IWA - 5210, Article IWA - 5000 - System Pressure Tests, of the ASME Section XI Code, 1974 Edition through Summer 1975 Addenda.

During the current outage of CR #3, it was necessary for FPC to make a welding repair to a welded elbow located in a 14 inch feedwater line connected to the A Steam Generator Feedwater Header. This elbow is located approximately 10 feet from the feedwater header. Section IWA - 5210 of the above referenced code requires that following a repair, the pressure retaining components be visually examined while the system is under the hydrostatic test pressure and temperature. It further states that the test pressure and temperature shall be maintained for at least four hours prior to the performance of the examinations.

General Office 3201 Thirty-fourth Street South • P.O. Box 14042, St. Petersburg, [illegible] 813—866-5151

A001
S
3/10

It is the requirement of a 4 hour hold time which FPC considers to be impractical for CR #3. The portion of the system which must be pressurized during the test cannot be isolated to the repair area due to the lack of valves in this portion of the feedwater system. Therefore, a large portion of feedwater system including the feedwater header and A Steam Generator must be pressurized to the hydrostatic test pressure and temperature and maintained for 4 hours prior to the inspection. It is this lack of isolation capability and the large piping size and volume to be pressurized which makes the 4 hour hold time impractical at CR #3. Also, in later addendums to the code (Winter 1977) Section IWA - 5210 has been expanded to include greater detail concerning the test conditions. Specifically the Winter 1977 Addendum included a new Section IWA - 5213, Test Condition Holding Time, which delineates holding times for pressure testing insulated and noninsulated systems or components. This later Code requires a 4 hour hold time for testing insulated systems and a 10 minute hold time for testing noninsulated systems. This later Code recognizes that the 4 hour hold time is only required when the repair area cannot be visually inspected (i.e. insulated pipe) and is required to allow time for moisture accumulation at low points in the insulated piping system. As the repair area in question at CR #3 is on noninsulated piping in the feedwater system, evidence of leakage during hydrostatic pressure testing is easily detected through visual inspection. Therefore, Florida Power Corporation proposes to use a 10 minute hold time as an alternative test method, as the 4 hour hold time is impractical at CR #3 for the reasons stated above and we feel that the later Code requirements more correctly reflect good operating practice.

In accordance with 10CFR 50.55a (g) (6) (i), it is hereby requested that Florida Power Corporation be granted relief from the Code requirements identified within this letter as being impractical for Crystal River Unit 3. Your expeditious treatment of this request will be greatly appreciated as this hydrostatic pressure test must be performed during the heatup of Crystal River Unit 3, which is currently scheduled for August 28, 1978. Should additional information be required by your staff to complete their review of our request, please do not hesitate to contact this office.

Very truly yours,

FLORIDA POWER CORPORATION

W. P. Stewart

W. P. Stewart

WPS/ECS/hew

File: 3-0-3-a-3

W08 (8/16)

STATE OF FLORIDA

COUNTY OF PINELLAS

W.P. Stewart states that he is the Director, Power Production, of Florida Power Corporation; that he is authorized on the part of said company to sign and file with the Nuclear Regulatory Commission the information attached hereto; and that all such statements made and matters set forth therein are true and correct to the best of his knowledge, information and belief.

W.P. Stewart

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 17th day of August 1978.

Notary Public

Notary Public, State of Florida at Large,
My Commission Expires: July 25, 1980