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VICE PRESIDENT  
NUCLEAR ENERGY  
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October 26, 1989

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Request for Relief from ASME Code Section XI Requirements

Gentlemen:

In accordance with 10 CFR 50.55a(a)(3), we are requesting partial relief from an ASME Code Section XI requirement.

On February 26, 1987, we submitted our 10-year ASME Section XI Pump and Valve Test Program. Page C-50, Rev. 1, September 26, 1988, of that submittal contains Relief Request Number A-3, concerning a Relief Valve Test Supervisor.

We have received indication, through our NRR Project Manager, that Relief Request A-3 will be denied. The partial relief requested by this letter addresses part of the requirement that Relief Request A-3 addressed.

I. Components for Which Relief is Requested

Relief valve testing per ASME Section XI, IWV-3512.

II. ASME Requirement from Which Relief is Requested

ASME Section XI, IWV-3512 requires compliance with ASME performance Test Code (PTC) 25.3-1976. Paragraph 3.02 of PTC 25.3 requires a person to supervise these tests who has obtained a degree in a branch of Engineering from a recognized school of Engineering and in addition, has at least two years practical experience in fluid flow measurement.

We request relief from the two years practical experience in fluid flow measurement requirement.

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III. Basis for Relief

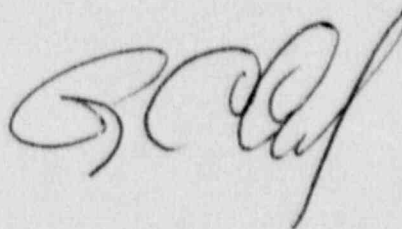
No fluid flow measurement is required by ASME Section XI, and none is performed by us in satisfying the requirement. The requirement has no effect on the performance of this relief valve testing. Supervision of relief valve testing is being performed by a degreed Engineer satisfying all of the requirements of PTC 25.3 with the exception of fluid flow measurement experience. We have placed an additional person in this position who meets all the requirements, in order to comply. This person's regular duties have nothing to do with relief valve testing. This is a hardship with no compensating increase in the level of quality and safety.

IV. Alternative Testing

No alternative testing is proposed. Supervision of relief valve testing will be performed by degreed Engineers satisfying all of the requirements of PTC 25.3 with the exception of fluid flow measurement experience.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



GCC/DLS/dlm

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