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APR 22 1977

Docket No. 50-346

Toledo Edison Company
 ATTN: Mr. Lowell E. Roe
 Vice President, Facilities
 Development
 Edison Plaza
 300 Madison Avenue
 Toledo, Ohio 43652

bcc: J. R. Buchanan, NSIC
 T. B. Abernathy, TIC

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Gentlemen:

SUBJECT: RELIEF FROM THE REQUIREMENTS OF THE ASME BOILER AND PRESSURE
 VESSEL CODE, SECTION XI (DAVIS BESSE NUCLEAR POWER STATION,
 UNIT 1)

We have completed our review of your proposed inservice inspection and
 testing program for Davis Besse, Unit 1 described in the enclosure to
 your letter dated November 9, 1976, and your request for relief from
 the requirements of the ASME Boiler and Pressure Vessel Code, Section
 XI.

Based on our review, we have concluded that your proposed inservice
 testing program for pumps and valves is acceptable for the limited
 period of time from the date of issuance of the facility operating
 license to the start of facility commercial operation. In lieu of
 the surveillance requirements of Section XI of the ASME Code, you shall
 perform the surveillance described in the enclosure to your letter dated
 November 9, 1976, except that pumps shall be tested every 31 days to
 conform to our requirements instead of the 92 days which you proposed
 in your submittal. On the basis that your proposed program is acceptable
 and shall be implemented for the period of time from issuance of the
 operating license to start of facility commercial operation, we hereby
 grant relief from the ASME Code requirements pursuant to Section 4.0.5a
 of the plant Technical Specifications.

With regard to your request for relief from the ASME Code requirements
 imposed by Section 4.0.5b of the plant Technical Specifications for the
 period of time following the start of facility commercial operation,
 we have determined that your request does not include sufficient infor-
 mation for us to make a determination pursuant to 10 CFR 50.55a(g)(6)(i)

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that ASME Code requirements are impractical for the areas of the facility for which you are requesting relief within the limitations of design, geometry, and materials of construction. The program which you submitted discusses only those portions of the ASME Code which you have determined to be practical.

In order for us to make an evaluation of your request for relief pursuant to 10 CFR 50.55a(g)(6)(i) for the period of time after the start of commercial operation, you will need to provide information to support your determinations of those items of inspection and testing which are deemed to be impractical for the facility. The specific information that we will need is provided as Enclosures 1 and 2 of this letter.

With regard to the request for relief, the NRC has received a number of inquiries from licensees regarding acceptable methods for complying with 10 CFR 50.55a(g). In general, these inquiries have been directed toward three major areas relative to compliance with the regulation:

1. The determination of which ASME Boiler and Pressure Vessel Code Edition and Addenda are applicable for any updated inservice inspection or testing program.
2. The requirement to conform the Technical Specifications to a revised program, and
3. The process of obtaining relief from ASME Code requirements found to be impractical.

Enclosure 1, "NRC Staff Guidance for Complying with Certain Provisions of 10 CFR 50.55a(g), Inservice Inspection Requirements," describes the major provisions of the revised regulation, addresses the areas of licensee concern listed above, and provides guidance on information which we will need to evaluate requests for relief from ASME Code requirements that are determined to be impractical.

As discussed in Enclosure 1, you should submit a description of your planned inservice inspection and testing programs, as well as any relief from ASME Code requirements determined to be impractical for the facility, as far in advance as possible of the start of any 40-month inservice inspection period, or 20-month pump and valve testing program.

In addition, we would like to emphasize an important point regarding the ASME Code Section XI requirements to test selected pumps and valves that are now incorporated in 10 CFR 50.55a(g): The ASME Code Section XI

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requirements apply only to selected valves and pumps that can be tested without placing the plant in an unsafe condition. You should exercise care in planning your testing program to ensure that no test will be conducted while the plant is in an operating mode that would make it vulnerable to a test error or a test failure. Particular attention should be directed toward the valve exercising (cycling) tests. In this regard, some basic guidelines for excluding exercising (cycling) tests of certain valves during plant operation are contained in Enclosure 2. Valve leakage tests and other valve and pump tests required by the ASME Code should be reviewed for each component, relative to each plant operating mode, to assure that no test will have an adverse impact on plant safety.

If you have any further questions regarding implementation of 10 CFR 50.55a(g) at your facility, please contact us.

Sincerely,

Original signed by R. C. DeYoung

Roger S. Boyd, Director
Division of Project Management
Office of Nuclear Reactor Regulation

Enclosures:

1. NRC Staff Guidance for Complying With Certain Provision of 10 CFR 50.55a(g)
2. Guidelines for Excluding Exercising (Cycling) Tests of Certain Valves During Plant Operation

cc w/enclosures:

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DATE →	4/20/77	4/20/77	4/22/77	4/22/77	4/22/77