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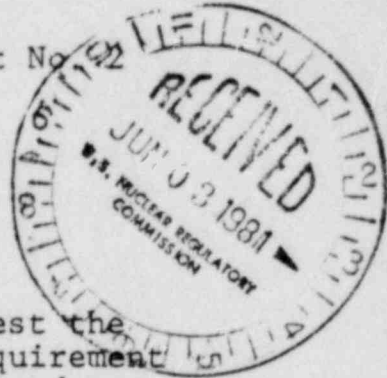
ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

May 29, 1981

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant Unit No. 2
Docket No. 50-318
Inservice Inspection (ISI) Program
Relief from ASME Code Requirements
Determined to be Impractical



Gentlemen:

In accordance with 10 CFR 50.55a(g)(6)(i), we request the Commission to grant exemption from an ASME Code requirement that has been determined to be impractical. In accordance with NRC Staff Guidance letter dated November 24, 1976, the information concerning the exemption request is presented herein.

During installation of a new motor operated valve in a two (2) inch, Class 2 pipe, an arc strike was made on the pipe adjacent to the socket weld being performed. The following steps were performed to repair the arc strike:

- 1) The arc strike was removed by grinding,
- 2) A liquid penetrant test was performed on the affected area after grinding,
- 3) A weld repair was made,
- 4) The weld build-up was then made smooth with the pipe surface by grinding,

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- 5) A liquid penetrant test was performed on the weld repair after grinding, and
- 6) A hydrostatic pressure test was performed at 1.25 times the design pressure after the weld repair was completed.

In addition to the above requirements, the Code also requires that a radiograph be performed after the repair. An acceptable radiograph examination of the repaired area would be impractical, if not impossible to perform due to the geometry of the repair with respect to the socket weld and the angle of the radiograph beam required to clear interferences around the pipe. The Commission is requested to exempt the requirements for performing a radiograph examination in this particular case.

A tabulation of the information required for this request is presented below.

I. Component for Which Relief is Requested:

A. Name and Number

Piping line number 2"-GC-5-2008 is the cross connect from the shutdown cooling line to the low pressure safety injection line. This line is shown as 2"-GC-5-1008 in Figure 6-1 (F-4) of the FSAR.

B. Function

The primary function of this line is to provide a means of flushing the reactor core in a reverse flow direction should a large break LOCA occur. The arc strike occurred when installing a motor operated valve in this line. This modification will allow the operators to align the system for core flushing from the control room and is considered a NUREG-0578 Section 2.1.6.b requirement.

C. Code Class

Regulatory Guide 1.26: Class 2
Original Design: B31.7 Class 2

II. Code Requirement from Which Relief is Requested:

The arc strike was repaired in accordance with ASME Code Section XI 1974 Edition with Addenda through Summer 1975. Since this particular repair is not specified in this Code the repair was performed in accordance with the Code applicable to the construction of the component as required

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by IWA-4100(c). USAS B31.7-1969 with 1970 Addenda paragraphs 20724.6 and 7 were followed to perform the repair with the exception of a radiograph examination as required by 2-724.7(e). It is the requirement of performing a radiograph examination from which relief is requested for this particular repair.

III. Supporting Information

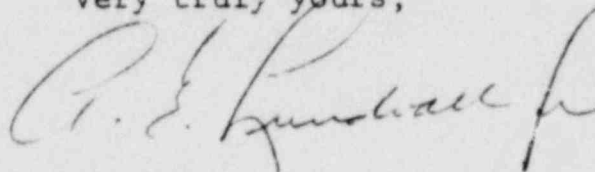
An acceptable radiograph examination of the repaired area would be impractical due to the geometry of the repair with respect to a socket weld and the angle of the radiograph beam required to clear interferences such as other pipes and supports around the pipe.

We have discussed this exemption request with Mr. R. E. Architzel, our Resident NRC Inspector.

We have determined that this request constitutes a Class III Amendment pursuant to 10 CFR 170.22, and accordingly a BG&E check in the amount of \$4,000.00 is submitted herewith.

Should you have further questions regarding this subject, please do not hesitate to contact us.

Very truly yours,



Vice President-Supply

AEL/BCR/gla

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
E. L. Conner, Jr. (NRC)
E. Jernigan, (NRC-Region I)
R. E. Architzel, (NRC)