



A Centenor Energy Company

DONALD C. SHELTON  
Vice President--Nuclear  
[418] 249-2300

Docket Number 50-346

License Number NPF-3

Serial Number 1754

January 5, 1990

United States Nuclear Regulatory Commission  
Document Control Desk  
Washington, D. C. 20555

Subject: Proposed Alternative to ASME Section XI Requirements for End of Interval Hydrostatic Test of the Steam Generators and Auxiliary Feedwater Valve Replacement (TAC Number M74524)

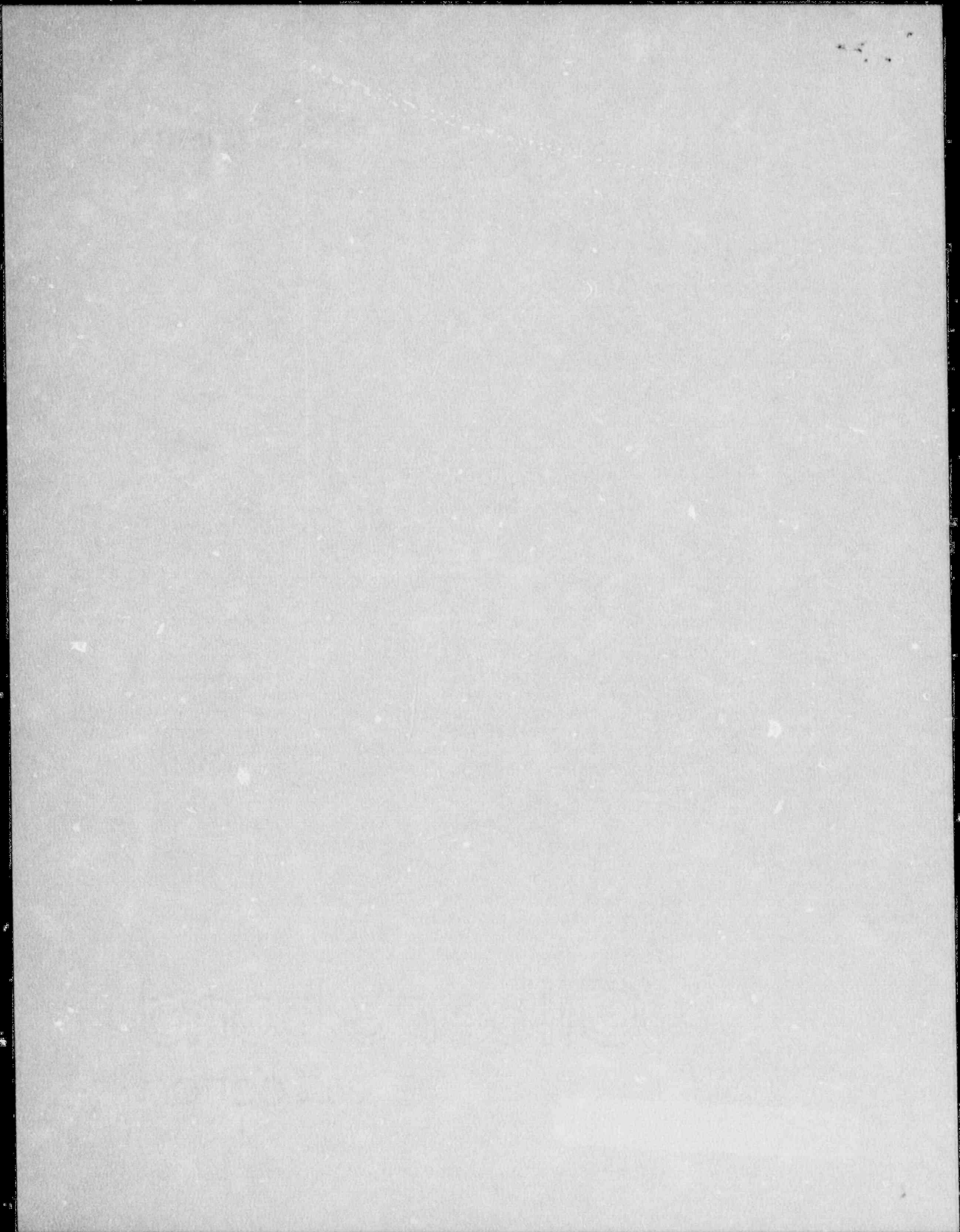
Gentlemen:

ASME Boiler and Pressure Vessel Code, Section XI requires that the Class 2 portion of the steam generators, associated auxiliary feedwater, main feedwater, and main steam piping be hydrostatically tested at or near the end of each 10-year in-service inspection (ISI) interval. The test, conducted in accordance with Section XI, requires the test parameters to be 1313 psig at 130°F to 200°F for a 4-hour hold time. Toledo Edison submitted pursuant to 10CFR50.55 a, Paragraphs (a)(3) and (g)(5)(iii) a request (Serial Number 1686, dated August 7, 1989) for the Nuclear Regulatory Commission (NRC) approval of a proposed alternative to these testing requirements. On the basis of time, cost, and radiological considerations, the request proposed an alternative to perform a hydrostatic test similar to the requirements for Class 1 piping. The alternate test would have been a 4-hour pressure test at 957 psi (110% above operating pressure) and normal system operating temperature followed by a VT-2 visual inspection of the entire test boundary.

Based on recent telephone discussions with the NRC staff, Toledo Edison understands that the NRC staff will not consider approval of the proposed alternative. Accordingly, Toledo Edison hereby withdraws the request for approval of the subject proposed alternative (Serial Number 1686).

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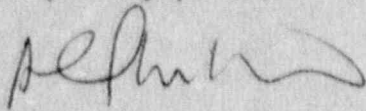
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Should further information be required, please contact Mr. R. W. Schrauder,  
Manager-Nuclear Licensing, at (419) 249-2366.

Very truly yours,

A handwritten signature in dark ink, appearing to be 'R. W. Schrauder', written in a cursive style.

GBK/ssg

cc: P. M. Byron, DB-1 NRC Senior Resident Inspector  
A. B. Davis, Regional Administrator, NRC Region III  
T. V. Wambach, NRC/NRR DB-1 Senior Project Manager  
State of Ohio

