



Portland General Electric Company

James E. Cross Vice President, Nuclear

February 22, 1991

Trojan Nuclear Plant  
Docket 50-344  
License NPF-1

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington DC 20555

Dear Sirs:

Relief Request From ASME Section XI Hydrostatic Test Requirement

Portland General Electric Company requests temporary relief from the requirement to perform a hydrostatic test following a replacement of a valve in a piping system governed by Section XI of the ASME Boiler and Pressure Vessel Code. The details of our request are contained in the Attachment.

Approval of this relief is requested by March 4, 1991 to support preparatory work for the 1991 refueling outage.

Sincerely,

Attachment

c: Mr. John B. Martin  
Regional Administrator, Region V  
U.S. Nuclear Regulatory Commission

Mr. David Stewart-Smith  
State of Oregon  
Department of Energy

Mr. R. C. Barr  
NRC Resident Inspector  
Trojan Nuclear Plant

9102270285 910222  
PDR ADOCK 05000344  
Q PDR

121 SW Salmon St, Portland, OR 97204  
503/464-8897

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INSERVICE INSPECTION RELIEF REQUEST

Component Description

Service Water System (SWS) Train B vent valve (SW-283) and associated piping [1-1/2 in. nominal pipe size (NPS)]

ASME Code Class

Section XI, Class 3

ASME XI Examination Requirements

Article IWA-5000 Subsubarticle IWA-5214a requires a pressure test as outlined by IWA-4400 prior to resumption of service. IWA-4400 requires a hydrostatic pressure test if the repair is performed by welding and is not exempted. The piping and valve are greater than 1 in. NPS, and therefore, are not exempted.

Relief Requested

Defer hydrostatic test of a brazed joint for relocation of Valve SW-283 to the 1991 Refueling Outage.

Basis for Relief

The current location of Valve SW-283 [Service Water (SW) Train B] prevents the removal of a waterbox head on Cooler VE-160A (Control Room Emergency Ventilation System Cooler, SW Train A). Removal of the VE-160A cooler head is necessary to perform inspections scheduled per NRC Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment". The 1991 Refueling Outage schedule has a Train A work window scheduled first, followed by a Train B work window. Relocation of Valve SW-283 during the Train B work window would require scheduling a second Train A work window to perform the inspection of Cooler VE-160A. Planning this additional Train A work window, or resequencing the train work windows (Train B first, Train A second) at this time, would have a significant impact on both outage preparations and planned outage activities.

To avoid these impacts on the outage, Valve SW-283 will be relocated prior to the 1991 Refueling Outage. A hydrostatic test of the brazed joint is not practical prior to placing the SW Train B back in service, as the time estimate (82-hours) for performing both the work and the hydrostatic test exceeds the 72-hour Trojan Technical Specification time limit on having a train of service water not operable. The action statement for the technical specification requires the Plant to be in cold shutdown within 36-hours of exceeding the 72-hour time limit. Testing requires pressurization of a major portion of the system. Deferral of the hydrostatic test to the 1991 Refueling Outage is therefore requested.

The 10-year hydrostatic test on this portion of the system is scheduled for the 1991 Refueling Outage (approximately mid-May). Thus, in lieu of the required hydrostatic test, a VT-2 visual examination of the affected brazed joint will be performed at normal operating pressure upon returning the system to full service.

The interim examination at normal system operating pressure will provide reasonable assurance of system integrity until performance of the hydrostatic test during the Refueling Outage.

Alternative Examination

A VT-2 visual examination at normal operating pressure will be performed. Also, the required hydrostatic test will be performed during the 1991 Refueling Outage.