



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

February 24, 1994

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Zion Nuclear Station Units 1 and 2  
Second Interval Inservice Inspection Program  
NRC Docket Nos. 50-295 and 50-304

Dear Dr. Murley:

The purpose of this letter is to inform your office of Commonwealth Edison's intent to utilize ASME Code Case N-416 in the Second Interval Inservice Inspection Program at Zion Station. Zion's use of this code case is documented in the attached Technical Approach and Position 12, which is being incorporated into the Second Interval Program. This code case would allow the deferral of the required repair/replacement hydrostatic test for Class 2 piping to the scheduled system hydrostatic test in instances where the component is not isolable or if the securing of relief or safety valves would be required in order to perform the hydrostatic test. Code Case N-416 is approved for use in Regulatory Guide 1.147 Revision 10 dated July 1993.

This code case is being adopted to allow the deferral of the hydrostatic test that is required due to the replacement of valve 2RH8734B. Valve 2RH8734B is isolable, but would require the securing of relief valve 2SI8856B. The performance of the hydrostatic test would have resulted in a delay in returning the RHR system to operable status and would have also had an adverse schedular impact.

Visual examination at system pressure as well as liquid penetrant exams of the partial penetration welds have been performed prior to returning the system service.

If there are any questions or comments regarding this matter, please direct them to this office.

Sincerely,

*Terrence W. Simpkin*

T.W. Simpkin  
Nuclear Licensing Administrator

280138

Attachments

cc: J. B. Martin, Regional Administrator - RIII  
C. Y. Shiraki, Project Manager - NRR  
J.D. Smith, Senior Resident Inspector - Zion

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**ZION STATION UNITS 1 AND 2  
SECOND TEN YEAR INTERVAL**

**TECHNICAL APPROACH AND POSITION 12**

**COMPONENT IDENTIFICATION**

Code Class:	2
References:	IWA-4400, IWA-4600
Examination Category:	Not Applicable
Item Number:	Not Applicable
Description:	Hydrostatic pressure test following Repair/Replacement by welding.

**CODE REQUIREMENTS**

IWA-4400 states : "After repairs by welding on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000.

IWA-4600 states that the rules and requirements of IWA-4000 "applies to the attaching of replacements (as defined in IWA-7110) to the system where such attachment is by welding.

**POSITION**

It is the position of Zion Station that for the repair or replacement of Class 2 piping that cannot be isolated by existing valves or that requires securing safety or relief valves for isolation, that the required system hydrostatic test required by IWA-4400 and IWA-4600 may be deferred until the next regularly scheduled system hydrostatic test in accordance with Code Case N-416 provided that the requirements of Code Case N-416 are met.

System Hydrostatic tests on the repaired or replaced portion of the piping system will be conducted in accordance with IWC-5000.

Code Case N-416 is approved for use in Regulatory Guide 1.147 Revision 10 dated July 1993. The use of Code Case N-416 will be documented on the NIS-1 form for Repairs and Replacements.