



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JAN 08 1991

MEMORANDUM FOR: M. Wayne Hodges, Director
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FROM: James E. Richardson, Director
Division of Engineering Technology, NRR

SUBJECT: IMPROPER INTERPRETATION OF GUIDANCE IN
GENERIC LETTER 90-05 BY PERMITTING
SERVICE WATER SYSTEM LEAKS

Generic Letter 90-05 entitled "Guidance for Performing Temporary Non-Code Repair of ASME Code Class 1, 2, and 3 Piping" was issued on June 15, 1990. Based upon feedback from a recent Commissioner site visit, the staff is concerned that some licensees may be improperly permitting leaks in service water systems without a repair because of the alleged complicated guidance provided in Generic Letter 90-05 for requesting a written relief.

The ASME Code Section XI does not permit continued operation of ASME Code Class 1, 2, and 3 piping and components with through-wall defects. As stated in Generic Letter 90-05 and the follow-up discussions, the staff finds repairs of ASME Code Class 1, 2, and 3 piping and components performed using methods other than those allowed by the ASME Code unacceptable without specific written relief granted by the NRC.

Licensee personnel alleged that Generic Letter 90-05 discourages non-code repairs, and thereby indirectly encourages operation with leaks in the service water system, because the guidance is too stringent. This is an incorrect interpretation of Generic Letter 90-05. In fact, Generic Letter 90-05 reminded licensees of the regulatory requirements that a code repair is required. Only when a code repair is impractical should a temporary repair be considered. The licensees are also reminded that a temporary non-code repair requires prior written relief granted by the NRC. Generic Letter 90-05 provides guidance for the staff in evaluating relief requests for temporary non-code repair of code Class 3 piping. The guidance ensures that the

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structural integrity of the degraded Class 3 piping remains acceptable until a code repair can be performed.

In the event that the regional staff determines that plants are operating with through-wall defects in their ASME Code Class 1, 2, and 3 piping and components without specific written relief granted by the NRC, appropriate enforcement actions should be taken to ensure compliance of 10 CFR 50.55a(g), Section XI of the ASME Code, and plant Technical Specifications.

Original signed by
B. D. Liaw

For

James E. Richardson, Director
Division of Engineering Technology
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