10CFR50.55a

BOSTON EDISON
Pilgrim Nuclear Power Station
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BECo Ltr. #95- 012

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

Docket No. 50-293
License No. DPR-35

Request to Use ASME Code Cases N-416-1 and N-498-1 at Pilgrim Station

Pilgrim Nuclear Power Station (PNPS) Technical Specification Section 3/4.6.G requires the structural integrity of the primary system to be surveilled in accordance with ASME Boiler and Pressure Vessel Code, Section XI.

Section 50.55a (a)(3) of 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities." states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficult without a compensating increase in the level of quality and safety.

In accordance with 10 CFR Part 55a (a)(3), PNPS requests authorization to use ASME Code Case N-416-1, "Alternative Pressure Test Requirement for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2, and 3, Section XI, Division 1," and Code Case N-498-1, "Alternative Rules for 10-Year System Hydrostatic Testing for Class 1, 2, and 3 Systems, Section XI, Division 1." Code Cases N-416-1 and N-498-1 have been approved by the ASME Code Committee but are not currently published in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability ASME Section XI Division 1."

Code Cases N-416 and N-498 are currently authorized for use by the Commission (i.e., both are published in RG 1.147). Code Case N-416 allows alternate pressure testing methods for welded repairs or installation of replacement items for Class 2 systems. Specifically, Code Case N-416 permits the use of a system leakage test in lieu of performing a hydrostatic pressure test. Code Case N-416-1 extends this Code Case to include Class 1 and 3 systems. We intend to apply Code Case N-416-1 to Class 1, Class 2 and Class 3 systems. Code Case N-498 allows alternate testing methods to be used for the 10-year hydrostatic pressure test of Class 1 and 2 systems. Specifically, Code Case N-498 permits the use of an inservice leakage test in lieu of a hydrostatic pressure test when performing the required 10 year pressure test. Code Case N-498-1 extends the use of this alternate test method to Class 3 systems.

Pilgrim requests authorization to use code Case N-416-1 because Code committee approval indicates that the use of Code Case N-416-1 will provide an acceptable level of safety and quality when applied to pressure testing; therefore, the proposed Code alternative (Code Case

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N-416-1) meets the requirement of 10 CFR 50.55a (a)(3)(i) and provides an acceptable level of quality and safety.

Pilgrim is scheduled to commence Refueling Outage #10 in March, 1995. During the refueling, we intend to perform Inservice Testing that would require hydrostatic testing unless we are allowed to use Code Cases N-416-1. To conduct hydrostatic pressure testing, a special test setup involving temporary installation of pumps, valving and electrical supplies and development of engineering documents and procedures is required, adding to expense but not significantly improving safety. In addition to avoiding costs associated with the special test setup, we believe that performing inservice leakage tests in lieu of hydrostatic pressure tests reduces the testing time. Therefore, proposed Code alternative Code Case N-416-1, as it relates to Pilgrim, meets the requirement of 10 CFR 55a (a)(3)(ii) in that hydrostatic pressure testing of Class 1, 2 and 3 systems results in an economic hardship without a compensating increase in the level of quality and safety. Therefore, Pilgrim requests authorization to use Code Case N-416-1 for RFO #10 and in future ISI evolutions.

Pilgrim also requests authorization to use Code Case N-498-1. Code Committee approval indicates that the use of Code Case N-498-1 provides an acceptable level of safety and quality when applied to pressure testing. Consequently, the proposed Code alternative (Code Case N-498-1) meets the requirement of 10 CFR 50.55a (a)(3)(i) in that an acceptable level of quality and safety is maintained.

We are currently developing the schedule for RFO #10 and for the Code required 10-year hydrostatic testing on Class 3 systems at Pilgrim. The expeditious granting of this request, which has been granted to other licensees, will allow Pilgrim to perform its Technical Specification required inspections in an acceptable and cost-effective way during RFO #10.

Should you wish further information on this request, please contact P. M. Kahler at (508) 830-7939.

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