



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

February 26, 1992

Docket No. 50-352

Mr. George J. Beck
Manager-Licensing, MC 5-2A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Beck:

SUBJECT: REQUEST FOR RELIEF FROM ASME CODE REPAIR REQUIREMENTS FOR
ASME CODE CLASS 3 PIPING FOR LIMERICK GENERATING STATION,
UNIT 1 (TAC NO. MB2329)

Your letter of December 19, 1991, requested relief in accordance with 10 CFR 50.55a(g)(5)(iii) from The American Society of Mechanical Engineers (ASME), Boiler and Pressure Vessel (B&PV) Code, Section XI, Subsection IWA and IWD requirements regarding the repair or replacement of an ASME Section III Code Class 3 pipe installed at Limerick Generating Station (LGS), Unit 1.

You advised us that you found a through wall (i.e., pin hole) leak in a section of 3" diameter Emergency Service Water (ESW) system piping that services the LGS, Unit 1, High Pressure Coolant Injection (HPCI) room unit cooler. The portion of ESW piping containing the leak is carbon steel ASME Section III Code Class 3 pipe and cannot be isolated. You suspect the leak is the result of localized corrosion caused by Microbiologically Induced Corrosion (MIC). You have also advised us in several meetings of the action plan by the raw water system task force to determine the cause of and develop a chemical treatment program to reduce the general and MIC corrosion in the Limerick service water systems. In your letter of December 19, 1991, you propose to leave the flawed section of pipe "as-is" and to monitor the leak in accordance with the guidance in Generic Letter (GL) 90-05. The pipe repair or replacement will be performed during the LGS, Unit 1 refueling outage scheduled to begin on March 21, 1992. We find the proposed actions acceptable as described in the enclosed safety evaluation.

We have determined pursuant to 10 CFR 50.55a(g)(6)(i) that code repair requirements in the case of the leak in the ESW are impractical as defined in GL 90-05. Repairing the pipe in conformance with code requirements would require a plant shutdown.

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Furthermore, you have committed to the guidance provided in GL 90-05 which will reasonably assure structural integrity and protect public health and safety. The structural integrity of the flawed pipe has been found acceptable by the "through wall" analysis technique defined in GL 90-05. If the pipe is found during the monitoring period to deteriorate enough to compromise structural integrity, an emergency repair will be done. Accordingly, the staff concludes that granting relief where code requirements are impractical and imposing alternative requirements are authorized by law and will not endanger the life or property or the common defense and security and are otherwise in the public interest, giving due consideration to the burden upon the licensee and facility that could result if the code requirements were imposed on the facility. Pursuant to 10 CFR 50.55a(g)(6)(i) and consistent with the guidance in GL 90-05, relief is granted from performing repair or replacement of the ESW piping servicing the LGS Unit 1 HPCI room unit cooler until the next scheduled outage exceeding 30 days, but no later than the next scheduled refueling outage. The flawed pipe must then be repaired or replaced in accordance with the code.

Sincerely,

Original signed by
Richard J. Clark

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:
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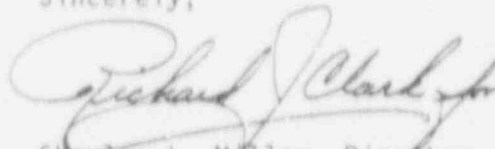
Mr. George J. Beck

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February 26, 1992

furthermore, you have committed to the guidance provided in GL 90-05 which will reasonably assure structural integrity and protect public health and safety. The structural integrity of the flawed pipe has been found acceptable by the "through wall" analysis technique defined in GL 90-05. If the pipe is found during the monitoring period to deteriorate enough to compromise structural integrity, an emergency repair will be done. Accordingly, the staff concludes that granting relief where code requirements are impractical and imposing alternative requirements are authorized by law and will not endanger the life or property or the common defense and security and are otherwise in the public interest, giving due consideration to the burden upon the licensee and facility that could result if the code requirements were imposed on the facility. Pursuant to 10 CFR 50.55a(g)(6)(i) and consistent with the guidance in GL 90-05, relief is granted from performing repair or replacement of the ESW piping servicing the LGS Unit 1 HPCI room unit cooler until the next scheduled outage exceeding 30 days, but no later than the next scheduled refueling outage. The flawed pipe must then be repaired or replaced in accordance with the code.

Sincerely,



Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:
See next page

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Philadelphia Electric Company

Limerick Generating Station,
Units 1 & 2

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