TUELECTRIC

Log # 1XX-92138 File # 10010

Ref. # 10CFR50.55a

March 12, 1992

William J. Cahill, Jr. Ricoup Vice President

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

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)-UNIT 1

DOCKET NO. 50-445

INSERVICE INSPECTION PROGRAM RELIEF REQUESTS

Gent lemen:

This letter requests relief from the inservice examination requirements. The requirements for the examinations are found in Section XI of the ASME Boiler and Pressure Vessel Code. The relief requests and related sketches are found in the attachments to this letter.

A brief description of the attachments (relief requests) is as follows:

### Attachment 1

Relief Request: B-1

Item: RV closure head to flange weld and RV closure head ring to

disc weld.

Examination Requirements: Table: IWB-2500-1

Category: 8-A Item No.: 81.40

### Attachment 2

Relief Request: 8-2

Item: Pipe to moment restraint circumferential weld.

Examination Requirements: Table: IWB-2500-1

Category: B-J Item No.: B9.11

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TXX-92138 Page 2 of 3

### Attachment 3

Relief Request: 8-3

Item: Pipe to reducing nozzle circumferential weld.

Examination Requirements: Table: IWB-2500-1

Category: B-J ltem No.: B9.11

### Attachment 4

Relief Request: C-Z

Item: Residual Heat Exchanger (RHR) Head to Shell Well and RHR Shell

to Flange Weld.

Examination Requirements: Table: IWC-2500-1

Category: C-A

Item No.: Cl.10 and Cl-2L

### Attachment 5

Relief Request: C-3

Item: Elbow and pipe circimferential welds.

Examination Requirements: Table: IWC-2500-1

Category: C-F-1 Item No.: C5.21

### Attachment 6

Relief Request: C-4

Item: Piping Integral Welded Attachments.

Examination Requirements: Table: IWC-2500-1

Category: C-C Item No.: C3.20

TXX-92138 Page 3 of 3 Attachment 7 Relief Request: f-1 Item: Component Supports Examination Requirements: Table: IWF-1300 We request that your approval be provided by July 31, 1992. Sincerely. William J. Cahill, Jr. QB/tg Attachments c = Mr. R. D. Martin, Region IV Mr. T. A. Bergman, NRR Mr. G. Bynog, TDLS Resident Inspectors (2)

Attachment 1 to TXX-92138 Page 1 of 3

# Relief Request B-1

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for Which Relief is Requested: RV closure head to flange weld (TBX-1-1300-1) and RV closure head ring to disc weld (TBX-1-1300-2). See attached drawing.

Code Class: 1

Examination Requirements: Table: IWB-2500-1 Examination Category: B-A Item No.: B1.40

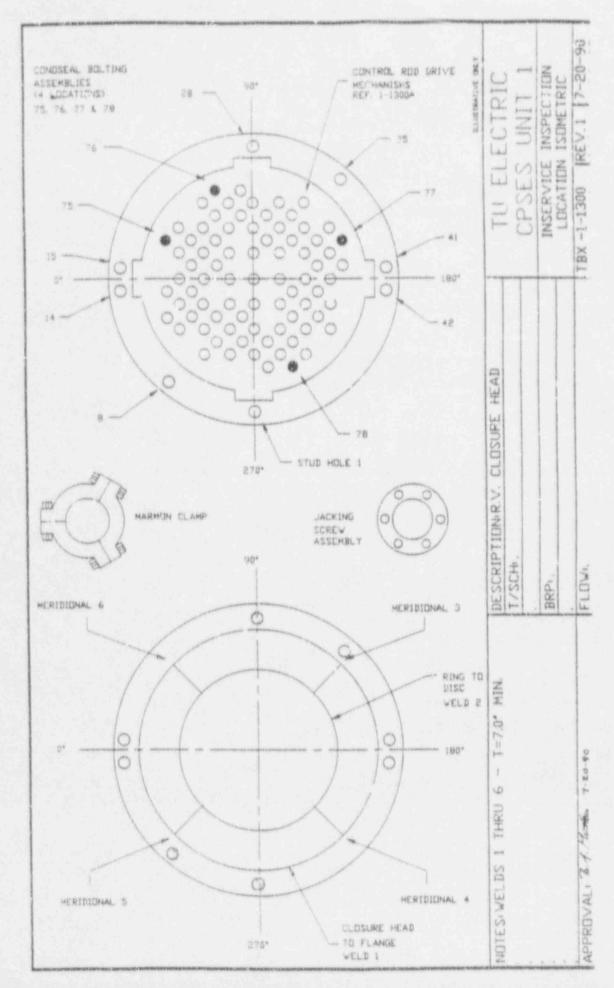
Table IWB-2500-1. Category B-A. Item No. B1.40 requires volumetric and surface examination of the reactor vessel head to flange weld and Item No. B1.21 requires volumetric examination of the reactor vessel circumferential head welds. The Plan requires that 1/3 of each of these welds be examined each period.

Basis for Relief: 1/3 of walds TBX-1-1300-1 and TBX-1-1300-2 were ultrasonically examined to the maximum extent possible, however, a portion of each was unable to be examined due to limitations encountered from the flange, shroud and a lifting lug. Required surface exam was performed and resulted in no indications. See attached Limitation to Examination sheet.

Alternate Examination: None

Safety Impact: The majority of each of these welds was examined and yielded no indications. There is no anticipated impact upon overall plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in exposure resulting from this relief request.



# RB2 WESTINGHOUSE NUCLEAR SERVICE DIVISION INSPECTION SERVICES LIMITATION TO EXAMINATION PLANT CMANCHE PEAK UNIT NO! SKETCH TBX-1-1300 REV. ! SYSTICOMP & V. CLOSURE I ERO PROCEDURE TX-IST-210 REVO.E.S. EXAMINER 27 Bel State 18 10-28-91 RELATED TO UIT X PIT MIT VIT ITEMIS) \_\_\_\_ / 2 + 5 PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION. - EXAM/SCAN SURFACE AREA-DIRECTION 7 FLANGE ZONGE # 1 WELDG LIFTING LUG # 5" WELD WELLE SHROUD BOLT HOLE 2045 E184 HOLE SURE 5 西一点 NOTE: 8% of weld #1 not examined using 45° angle beam

13% of weld #2 not examined using 45° angle beam 12% of weld #1 not examined using 60° angle beam 17% of weld #2 not examined using 60° angle beam

Attachment 2 to TXX-92138 Page 1 of 2

### Relief Request B-2

Code Yaar: 1986 Edition. No Addenda ASME Section XI

Code Class: 1

Examination Requirements: Table: IWB-250Q-1 Examination Category: B-J Item No.: B9.11

Table IWB-2500-1, Category B-1, Item B9.11 requires surface and volumetric examination of circumferential pressure retaining welds in piping.

Basis for Reisef: Weld TBX-1-4103-4 was ultrasonically examined to the maximum extent possible, however, a portion of the weld was unable to be examined due to limitations encountered from pipe nozzles and a component support. The required surface examination was performed and resulted in no indication. See attached Limitation to Examination sheet.

Alternative Examination: None

Safety Impact: This weld was examined to the maximum extent possible and yielded no indications. There is no anticipated impact upon the overall plant quality and safety resulting from this relief request.

Radiological Concerns: True is no change in exposure resulting from this relief request.

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Attachment 3 to TXX-92138 Page 1 of 2

### Relief Request B-3

Code Year: 1986 Edition, No Addenda ASEJ Section XI

Items for which Relief is Requested: Pipe to reducing nozzle circumferential weld (TBX-1-4503-30).

Code Class: 1

Examination Requirements: Table: IWB-2500-1 Examination Category: B-J Item No.: B9.11

Table IWB-2500-1, Category B-J, Item No. B9.11 requires surface and volumetric examination of circumferential pressure retaining welds in piping.

Basis for Reliaf: Weld TEX-1-4503-30 was ultrasonically examined to the maximum extent possible, however, a portion of the weld was unable to be examined due to limitations encountered from the reducing nozzle. The required surface examination was performed and resulted in no indications. See attached Limitation to Examination sheet.

Alternative Examination: None

Safety Impact: This weld was examined to the maximum extent possible and yielded no indications. There is no anticipated impact upon overall plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in exposure resulting from this relief request.

# WESTINGHOUSE NUCLEAR SERVICE DIVISION RB. 3 INSPECTION SERVICES LIMITATION TO EXAMINATION PLANT COMANCHE FEAR ONT NO. 1 SKETCH TRX-1-4503 REV1 SYST COMP. PRESSURINER SPRAY PROCEDURETX-EST-207 REV. O. FC1213 EXAMINER RAME P. Delluno DATE 10-31-91 RELATED TO UT X PIT WIT VIT TEMIS! WELD 30 PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION OD /25166 5 514E/00 IB WELD CONFIGURATION ( PIPE TO REDUCING NOZZLE) RESTRICTS ALL SCANS, APPROX. 15% OF EXAMINATION VOLUME NOT EXHMINED. WELL 30

Attachment 4 to TXX-92138 Page 1 of 3

## Relief Request C-2

Code Year: 1986 Edition. No Addenda ASME Section XI

Items for which Relief is Requested: Residual Heat Exchanger Head to Shell Weld (TBX-2-1120-1-1) and Residual Heat Exchanger Shell to Flange Weld (TBX-2-1120-1-2). See attached drawing.

Code Class: 2

Examination Requirement: Table: IWC-2500-1 Examination Cate pry: C-A Item No.: C1.10 and C1.20

Table IWC-2500-1, Category C-A, Item No. C1.20 requires 100% volumetric examination of the head to shell wold, and Item No. C1.10 requires 100% volumetric examination of the shell to flange weld.

Basis for Relief: Welds TBX-2-1120-1-1 and TBX-2-1120-1-2 were ultrascrically examined to the maximum extent possible, however, a portion of each weld was unable to be examined due to limitations encountered. See attached Limitation to Examination speets.

Alternative Examination: None

Safety Impact: Each weld was examined to the maximum extent possible and yiu ded no indications. There is no anticipated impact upon overall plant quality and safety resulting from this relief request.

Radiolog.cal Concerns: There is no change in radiation exposure resulting from this relief request.

WESTINGHOUSE NUCLEAR SERVICE DIVISION SERVICES					58-6		
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			A SERVICE DIVISION		58-6
LIMITATION TO EXAMINATION					
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42% NOT EXAMINED

Attachment 5 to TXX-92138 Page 1 of 2

# Relief Request C-3

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for which Relief is Requested: Elbow and pine circumferential welds TBX-2-2570-32 and TBX-2-2570-33. See attached drawing.

Code Class: 2

Examination Requirements: Table TWC-2590-1 Category: C-F-1

Item No.: C5.21

Table IWC-25. -1, Category C-F-1, Item No. C5.21 requires 100% surface and 100% volumetric examination of selected circumferential weids.

Basis for Relief: Welds TBX-2-2570-32 and TBX-2-2570-33 were ultrasonically examined to the maximum extent possible; however, a portion of each weld was unable to be examined due to limitations of the elbow introdos. Required surface examinations were performed with no resulting indications. See attached Limitation to Examination

Alternative Examination: None

The majority of each weld was examined and yielded no indications. There is no anticipated impact upon overall Safety Impact: plant quality and safety resulting from this relief request.

Radiological Concerns: There is no charge in radiation exposure resulting from this relief request.

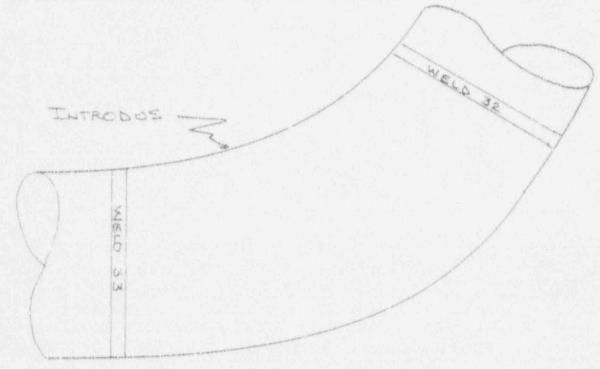
WES	TINGHOUSE NUCLEAR SERVICE DIVISION
	INSPECTION SERVICES
	LIMITATION TO EXAMINATION

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PLANT COMPAGNE PEAK INT NO. 1 SKETCH JBY-2-2570, REV. L	gayaz.
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PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.



THERODOS OF 45° ELBOW RESTRICTS 4" OF 2 7 18 SCANS FOR WELD 32 AND 4' OF 5,718 SUANS FOR WELD 33 14% OF EXAMINATION VOLUME FOR WELDS 32 AND 33 NOT EXAMINED

Attachment 6 to TXX-92138 Page 1 of 3

## Relief Request C-4

Code Year: 1986 Edition, No Addenda ASME Section X1

Items for which Relief is Requested: Piping Integral Welded Attachments
TBX-2-2536-H2 and TBX-2538-H-17. See
attached drawing.

Code Class: 2

Examination Requirements: Table: IWC-2500-1

Cutegory: C-C Item No.: C3.20

Table 1WC-2500-1, Category C-C. Item No. C3.20 requires 100% surface examination of integrally welded attachments to piping.

basis for Relief: Integrally welded attachments TBX-2-2536-H2 and TBX-2-2538-H17 were surface examined to the maximum extent possible; however, a portion of each weld was unable to be examined due to limitations associated with welded spacers on the bottom surface of the top lugs. See attached Limitation to Examination sheet.

Alternative Examination: None

Safety Impact: The majority of each of these welds were examined and yielded no indications. There is no anticipated impact upon overall plant quality and safety resulting from this relief request.

Radiological Concerns: There is no change in radiation exposure resulting from this relief request.

# WESTINGHOUSE NUCLEAR SERVICE DIVISION INSPECTION SERVICES

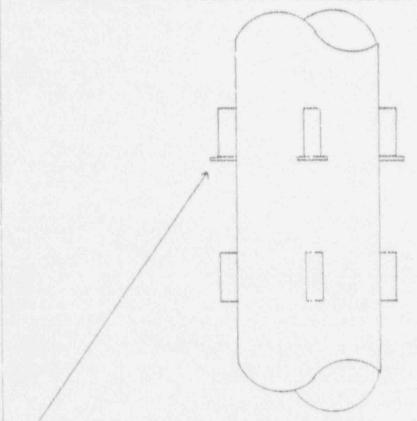
58-5

### LIMITATION TO EXAMINATION

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PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION



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# WESTINGHOUSE NUCLEAR SERVICE DIVISION INSPECTION SERVICES

58-6

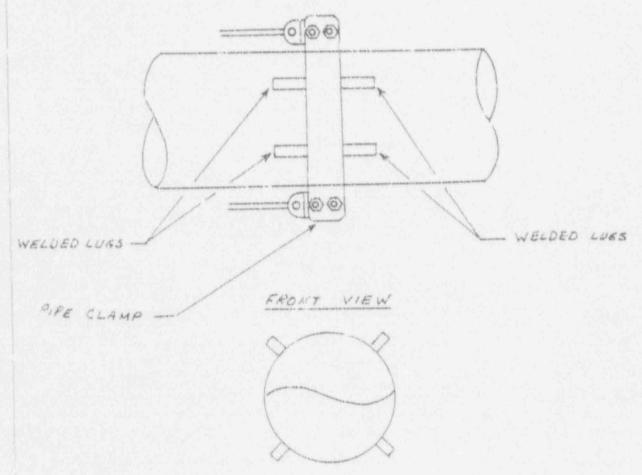
# LIMITATION TO EXAMINATION

PLANT COMANCHE PEAK	UNIT NO.	SKETCH
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PROVIDE GENERAL INFORMATION TO DESCRIBE APPROXIMATE SIZE, LOCATION AND TYPE OF LIMITATION.

## TOP VIEW



PIPE CLAMP RESTRICTS P.T. EXAMINATION ON ALL 8
WELDED LUGS 12" ON SIDES ADJACENT TO CLAMP

Attachment 7 to TXX-92138 Page 1 of 2

### Relief Request F-1

Code Year: 1986 Edition, No Addenda ASME Section XI

Items for which Relief is Requested: Component Supports.

Code Class: 3

Examination Requirements: 1WF-13CO describes the boundaries of component supports requiring examination (VT-3).

IWF-1300(e) states:

"Where the mechanical connection of a non-integral support is bried within the component insulation, the support boundary may extend from the surface of the component insulation, provided the support either carries the weight of the component or serves as a structural restraint in compression."

Basis for Relief: for those portions of class 3 components supports that are buried in the insulation of the component and do not carry the weight of the component nor serve as a structural restraint in compression it is requested that those buried portions of the support not be examined. Removal and reinstallation of insulation on class 3 piping requires a significant amount of scaffolding erection/removal and man-power. For class 3 integral attachments insulation will be removed to perform code required examinations.

Alternate Examination: None

Safety Impact: There is no anticipated impact upon overall plant quality and safety resulting from this relief request as:

- Only a small portion of the support is buried in insulation; therefore the majority of the support is examined.
- The stress levels in those buried portions are usually low.

Attachment 7 to TXX-92138 Page 2 of 2

Radiological Concerns: Potential radiation exposure will be reduced by not having to:

- 1) install scaffolding.
- 2) remove insulation.
- 3) reinstall insulation.
- 4) remove scaffoldings,