



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

February 19, 1992

Docket No. 50-317

Mr. G. C. Creel
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
MD Rts. 2 & 4
Lusby, Maryland 20657

Dear Mr. Creel:

SUBJECT: RELIEF REQUEST FROM THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS (ASME) CODE REQUIREMENTS TO ALLOW TEMPORARY NON-CODE REPAIR OF CODE CLASS 3 PIPING - CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NO. 1 (TAC NO. M82214)

By letter dated November 27, 1991, Baltimore Gas and Electric Company (BG&E) requested relief to allow the use of a temporary non-code repair on Calvert Cliffs Nuclear Power Plant, Unit 1, Class 3 piping. On November 24, 1991, a 3/8-inch through-wall hole was discovered during power operation in a 30-inch diameter concrete-lined carbon steel pipe. This Class 3 pipe is located in the Unit 1 saltwater system header. The hole was located on the inside radius of a 90° elbow on the upstream side of the inlet to the No. 11 salt water heat exchanger.

BG&E's request is for relief from the requirements of the American Society of Mechanical Engineers (ASME) Code, Article IWA-4000 of Section XI, which provides the code-acceptable repair methods for code class piping. Pursuant to 10 CFR 50.55a(g)(5)(iii), BG&E has requested relief from ASME Code, Article IWA-4000, for performing a code-acceptable repair because a code repair is impractical during power operation. The Code of Federal Regulation at 10 CFR 50.55a(g)(6)(i) indicates that the Commission will evaluate determinations of impracticability and may grant relief or impose alternatives.

Generic Letter (GL) 90-05, entitled "Guidance for Performing Temporary Non-Code Repair of ASME Class 1, 2, and 3 Piping," dated June 15, 1990, provides guidance for the staff in evaluating relief requests submitted by licensees for temporary non-code repairs of code Class 3 piping for flaws detected during plant operation. GL 90-05 guidelines specify that the following areas must be addressed in a licensee's evaluation to support relief:

1) determination of impracticability, 2) root cause determination and flaw characterization, 3) flaw evaluation, and 4) augmented inspection. The results of an evaluation, using the above considerations, should provide the necessary assurance that the flawed piping has adequate structural integrity until the flaw can be repaired during a plant shutdown.

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Mr. G. C. Creel

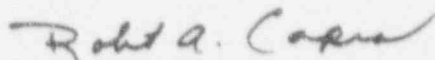
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BG&E utilized the guidance provided in GL 90-05 in its relief request and the NRC staff has determined that a code-acceptable repair is impractical, as defined in GL 90-05, the flawed pipe has adequate structural integrity, and there is reasonable assurance that the structural integrity will be maintained until the flaw can be repaired during a plant shutdown. Additional details are included in the enclosed Safety Evaluation. Therefore, pursuant to 10 CFR 50.55a(g)(6)(i), the NRC staff concludes that code-acceptable repairs are impractical, the temporary non-code repairs are consistent with the guidance of GL 90-05, and relief is granted until the next scheduled outage exceeding 30 days, but no later than the next refueling outage during which the temporary non-code repair must be replaced in accordance with the ASME Code, Article IWA-4000, or the flawed piping replaced. Such relief is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest. This relief has been granted giving due consideration to the burden upon the licensee that could result if the requirement were imposed upon the facility.

This completes our action related to the above referenced TAC number.

Sincerely,



Robert A. Capra, Director
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Safety Evaluation

cc w/enclosure:
See next page

Mr. G. C. Creel
Baltimore Gas & Electric Company

Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 and 2

cc:

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