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Georgia Power

the southern electric system

C. K. McCoy
Vice President, Nuclear
Vogtle Project

December 22, 1995

LCV-0700

Docket Nos. 50-424
50-425

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT
RELIEF REQUEST FROM ASME SECTION XI REQUIREMENTS

In accordance with the provisions of 10 CFR 50.55a(a)(3), Georgia Power Company (GPC) submits for review and approval two relief requests pertaining to the inservice test (IST) program for Vogtle Electric Generating Plant (VEGP), Units 1 and 2. The enclosure provides relief requests to Revision 9 of VEGP-1 IST Program document ISI-P-008 and to Revision 6 of VEGP-2 IST Program document ISI-P-016. The IST program currently in effect at VEGP was written to the requirements of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, 1983 Edition with Addenda through Summer 1983 except where relief has been granted by the NRC.

Pursuant to 10 CFR 50.55a(a)(3)(ii), GPC is requesting relief from the requirements of Subsection IWV, Article IWV-3520 and guidance provided in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants", Section 4.1.2 with regard to exercising check valves with flow and nonintrusive techniques. Currently, GPC performs a disassembly inspection on one (1) accumulator check valve each refueling outage in accordance with previously approved Relief Request RR-7. The revised Relief Request RR-7, which is provided as Enclosure 1 to this letter, will allow GPC to perform a partial flow test using nonintrusive techniques to verify full-stroke capability of the check valve instead of performing a disassembly inspection. Although nonintrusive techniques have been approved by the NRC as an acceptable alternative means, the alternative test plan for the accumulator check valves does not meet the sampling program as outlined in the guidance provided in NUREG-1482. As such, GPC is requesting NRC review and approval of this alternative test plan.

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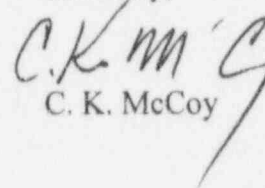
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Pursuant to 10 CFR 50.55a(a)(3)(i), relief is also being requested from the requirements of Subsection IWV, Article IWV-3000, Paragraphs IWV-3421 and IWV-3422 with regard to containment isolation valves. These paragraphs of the ASME Section XI Code require leak rate testing of containment isolation valves at least once every two years. This new Relief Request RR-29, which is provided as Enclosure 2 to this letter, would allow VEGP to perform leak rate testing of containment isolation valves on a performance based frequency in accordance with Option B of 10 CFR 50, Appendix J which was approved by the NRC as noticed in the Federal Register on September 25, 1995.

The NRC is requested to grant GPC interim approval of Relief Requests RR-7 and RR-29 by February 20, 1996 pending the NRC's full review and approval. These relief requests support IST Program activities to be conducted during the VEGP, Unit-1, Maintenance and Refueling Outage which is currently scheduled to begin March 3, 1996.

Should there be any questions regarding this issue, please contact this office.

Sincerely,


C. K. McCoy

CKM/KLG/klg

Enclosure 1: IST Program Relief Request RR-7
Enclosure 2: IST Program Relief Request RR-29

cc: Georgia Power Company
Mr. J. B. Beasley, Jr.
Mr. M. Sheibani
NORMS

U. S. Nuclear Regulatory Commission
Mr. S. D. Ebnetter, Regional Administrator
Mr. L. L. Wheeler, Licensing Project Manager, NRR
Mr. C. R. Ogle, Senior Resident Inspector, Vogtle

ENCLOSURE 1

IST PROGRAM RELIEF REQUEST RR-7

SYSTEM: Safety Injection - System No. 1204

VALVES: 1204-U6-079, 1204-U6-080, 1204-U6-081, 1204-U6-082

CATEGORY: AC

CLASS: 1

FUNCTION: These valves open when the downstream pressure is less than the upstream pressure which allows cold leg injection from the accumulator tanks.

QUARTERLY
TEST

REQUIREMENT: Verify forward flow operability (IWV-3520)

BASIS FOR
RELIEF:

The safety injection system (SIS) accumulator tanks are isolated from the reactor coolant system (RCS) by these normally closed check valves. Each accumulator is charged with a nitrogen blanket of approximately 650 psig. This pressure is insufficient during normal power operation to inject into the RCS. If these valves were to be exercised at cold shutdown, the contents of the tank would be discharged into the RCS at the charge pressure of 650 psig which could result in a low temperature overpressurization of the RCS.

Nonintrusive testing techniques are recognized as an acceptable means of verifying that a check valve fully strokes (Reference NUREG-1482, Paragraph 4.1.2). Since performance of the nonintrusive test requires a partial blowdown of the accumulator and the installation of test equipment inside containment, the only practical time to perform the test is at refueling. Additionally, during the accumulator blowdown, thermal stresses are imposed on the accumulator tank due to the rapid expansion of the nitrogen blanket which could serve to shorten the tank's life. Therefore, in order to minimize the number of thermal cycles on the accumulator tank, only one valve will be nonintrusively tested for flow exercising each refueling outage.

ENCLOSURE 1

IST PROGRAM RELIEF REQUEST RR-7

(continued)

ALTERNATE
TESTING:

One of these valves will be tested using nonintrusive check valve testing techniques or will be disassembled, inspected and manually exercised, during each refueling outage on a staggered test frequency. If nonintrusive testing is performed and does not show a full valve exercise or the test indicates a degraded condition, the valve will be disassembled, inspected and manually exercised. If disassembly reveals that the valve is inoperable, the remaining valves will be disassembled.

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ENCLOSURE 2

IST PROGRAM RELIEF REQUEST RR-29

SYSTEM: All valves which perform a containment isolation function.

VALVES: All Containment Isolation Valves (CIVs)

CATEGORY: A and AC

CLASS: 1 and 2

FUNCTION: The subject valves provide for containment isolation.

TEST

REQUIREMENT: Verify valve seat leakage is within acceptable limits at least once every two years as required by IWV-3421 and 3422.

BASIS FOR
RELIEF:

10 CFR 50, Appendix J has recently been revised to add Option B which provides for a performance based containment isolation valve testing program. Subsequently, 10 CFR 50, Appendix J, Option B was approved for use by the NRC by issue in the Federal Register on September 25, 1995. This new Option B allows for the extension of CIV, type C, leakrate tests to a five (5) year test frequency if justified by previous test results. Therefore, if the latest version of 10 CFR 50, Appendix J, Option B is utilized for leakrate testing CIVs, the ASME Section XI Code two year test frequency requirement is not justifiable.

ALTERNATE
TESTING:

Containment isolation valves will be scheduled for leakrate testing in accordance with 10 CFR 50, Appendix J, Option B.

For instances where the Appendix J leakrate test is utilized to confirm valve closure (e.g. check valve) in accordance with IWV-3522, the test frequency will be maintained on a refueling outage frequency.