Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 7, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
In-Service Inspection Program
Submittal of Relief Requests RI-22 and RI-23
NRC Docket Nos. 50-373 and 50-374

Dr. Murley:

Commonwealth Edison (CECo) intends to replace each Unit's Reactor Core Isolation Cooling (RCIC) system Steam Supply Inboard Isolation Valve (1E51-F063 and 2E51-F063) during each Unit's fifth refueling outage. CECo also intends to install mating flanges on the RCIC system Head Spray piping during the same refueling outages.

Both of these replacements require the performance of a hydrostatic test after the replacement is performed, in accordance with the 1980 Edition, Winter 1980 Addenda of ASME Section XI. To support replacement, code relief is requested with respect to ASME Section XI Paragraphs IWA-5214 and IWB-5222(a). The attached relief requests, RI-22 and RI-23, present CECo's proposed alternate examinations.

Relief requests RI-22 and RI-23 are applicable to both Units 1 and 2, and it is requested that the relief extend through the remainder of the first 10 year Inspection Interval, which will be completed after each Unit's sixth refueling outage.

Commonwealth Edison requests approval of this relief request to support the upcoming Unit 1 refueling outage which is scheduled to begin on September 26, 1992.

Please contact this office should further information be required.

Respectfully,

JoAnn M. Shields
Nuclear Licensing Administrator

Attachment: Relief Requests RI-22 and RI-23 for LaSalle County Station

cc: A. Bert Davis, Regional Administrator-RIII
B.L. Siegel, NRR Project Manager-LaSalle
D. Hills, Senior Resident Inspector-LaSalle
R.A. Hermann, NRR Technical Staff
J.A. Davis, NRR Technical Staff
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RELIEF REQUEST NO. RI-22
FOR LASALLE COUNTY STATION UNITS I & II

COMPONENT IDENTIFICATION

Code Class: 1

References: Article IWA-5000
Article IWA-7000
Article IWB-5000
Article IWB-7000

Examination Category: B-J

Item Number: B9.11

Description: Relief from ASME Section XI Hydrostatic Test Requirements after Repair/Replacement.

CODE REQUIREMENT

LaSalle Station is committed to the 1980 Edition, Winter 1980 Addenda of ASME Section XI. Articles IWA-7000 and IWB-7000 govern the replacement of the station's Reactor Core Isolation Cooling (RCIC) system Steam Supply Inboard Isolation Valves (1E51-F063 in Unit 1, and 2E51-F063 in Unit 2). The referenced articles require the performance of a hydrostatic test after the replacement is completed. The specific requirements for the performance of the hydrostatic test are provided in Paragraph IWA-5214 and Subparagraph IWB-5222(a). IWB-5222(a) states that the system hydrostatic test shall be conducted at a test pressure 1.10 times the system nominal operating pressure that corresponds with 100% rated reactor power except when the test is conducted at temperatures above 100 degrees Fahrenheit (38 C) to meet the requirements of IWB-5230.

BASIS FOR RELIEF

Due to the physical location of the replacement valve(s) in the piping system, LaSalle Station is unable to provide a practical upstream hydrostatic test boundary between the replacement valve(s) and the Reactor Pressure Vessel. The inability to provide such an isolation boundary would result in undue hardship, and difficulty in that a Hydrostatic Test of the Reactor Pressure Vessel would be required in order to meet the Code specified examination. The valve lineup associated with Hydrostatic test of the Reactor

Pressure Vessel would require that certain Safety System components such as the Mainsteam Safety Relief Valves be gagged, and that other overpressure protection devices and instruments be defeated in order to prevent their actuation during the test. The technical basis for requesting relief from the Code Requirement is supported by the fact that the replacement valve(s) will be constructed in accordance with ASME Section III Class 1 rules which require that the completed component be hydrostatically tested at the Manufacturers shop. The weldments which join the new replacement valve(s) component to the connecting piping will also be required to meet ASME Section III, Class 1 standards and will therefore be subjected to both Surface and Volumetric Examination. Upon completion of the construction phase of the Replacement, additional Volumetric Examination using the Ultrasonic method will be performed to meet the Preservice Inspection requirements of the 1980 Edition, Winter 1980 Addenda of ASME Section XI. It is the belief of LaSalle County Station that this level of Nondestructive Examination when combined with the Proposed Alternative Examination described below, give adequate assurance that the structural integrity of the system has been maintained, as well as providing the appropriate level of quality and safety.

PROPOSED ALTERNATE EXAMINATION

In lieu of the Code Requirement, LaSalle County Station shall perform the System Leakage Test as described in Subparagraph IWA-5211(a), and Paragraph IWB-5220. This proposed alternative pressure test shall be conducted at a test pressure not less than the nominal operating pressure associated with 100% rated reactor power.

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APPLICABLE TIME PERIOD

This relief is requested for each refueling outage for LaSalle County Station Units 1 & 2, beginning with the fifth refueling outage for Unit 1 which is scheduled to begin September 26, 1992. It is also requested that the relief extend through the remainder of the first 10 year Inspection Interval for each Unit (1 & 2) which will be completed after that Unit's sixth refueling outage. The sixth refueling outage for LaSalle County Station Unit 1 is scheduled to end in May of 1994. The sixth refueling outage for LaSalle County Station Unit 2 is scheduled to end in May of 1995. Extension of the relief for these specific applications (replacement of the 1 & 2E51-F063 valves) through the end of the Inspection Interval would alleviate the need to generate an additional relief request if installation of the subject design changes were deferred from the upcoming fifth refueling outage(s) due to uncertainty in scheduling.

RELIEF REQUEST NO. RI-23
FOR LASALLE COUNTY STATION UNITS I & II

COMPONENT IDENTIFICATION

Code Class: 1

References: Article IWA-5000
Article IWA-7000
Article IWB-5000
Article IWB-7000

Examination Category: B-J

Item Number: B9.11

Description: Relief from ASME Section XI Hydrostatic Test Requirements after Repair/Replacement.

CODE REQUIREMENT

LaSalle Station is committed to the 1980 Edition, Winter 1980 Addenda of ASME Section XI. Articles IWA-7000 and IWB-7000 govern the replacement of a portion of the Reactor Core Isolation Cooling (RCIC) system Head Spray piping with a pair of mating flanges. The flanges will be added at the highest point in the RCIC Head Spray piping (for Units 1 & 2) in the vicinity of the connection of this piping to the Reactor Pressure Vessel Head Spray Nozzle (N-7). The referenced articles require the performance of a hydrostatic test after the replacement is completed. The specific requirements for the performance of the hydrostatic test are provided in Paragraph IWA-5214 and Subparagraph IWB-5222(a). IWB-5222(a) states that the system hydrostatic test shall be conducted at a test pressure 1.10 times the system nominal operating pressure that corresponds with 100% rated reactor power except when the test is conducted at temperatures above 100 degrees Fahrenheit (38 C) to meet the requirements of IWB-5230.

BASIS FOR RELIEF

Due to the physical location of the new flanges in the piping system, LaSalle Station is unable to provide a practical upstream hydrostatic test boundary between the flanges and the Reactor Pressure Vessel. The inability to provide such an isolation boundary would result in undue hardship, and difficulty in that a Hydrostatic Test of the Reactor Pressure Vessel would be required in order to meet the Code specified

examination. The valve lineup associated with Hydrostatic test of the Reactor Pressure Vessel would require that certain Safety System components such as the Mainsteam Safety Relief Valves be gagged, and that other overpressure protection devices and instruments be defeated in order to prevent their actuation during the test. The technical basis for requesting relief from the Code Requirement is supported by the fact that the new flanges and the weldments which join them to the connecting piping will be constructed in accordance with ASME Section III Class 1 rules. These rules require that the completed flanges be subjected to Surface Examination by the manufacturer, and that the completed welds be subjected to both Surface and Volumetric Examination. Upon completion of the construction phase of the Replacement, additional Volumetric Examination using the Ultrasonic method will be performed to meet the Preservice Inspection requirements of the 1980 Edition, Winter 1980 Addenda of ASME Section XI. It is the belief of LaSalle County Station that this level of Nondestructive Examination when combined with the Proposed Alternative Examination described below, give adequate assurance that the structural integrity of the system has been maintained, as well as providing the appropriate level of quality and safety.

PROPOSED ALTERNATE EXAMINATION

In lieu of the Code Requirement, LaSalle County Station shall perform the System Leakage Test as described in Subparagraph IWA-5211(a), and Paragraph IWB-5221. This proposed alternative pressure test shall be conducted at a test pressure not less than the nominal operating pressure associated with 100% rated reactor power.

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APPLICABLE TIME PERIOD

This relief is requested for each refueling outage for LaSalle County Station Units 1 & 2, beginning with the fifth refueling outage for Unit 1 which is scheduled to begin September 26, 1992. It is also requested that the relief extend through the remainder of the first 10 year Inspection Interval for each Unit (1 & 2) which will be completed after that Unit's sixth refueling outage. The sixth refueling outage for LaSalle County Station Unit 1 is scheduled to end in May of 1994. The sixth refueling outage for LaSalle County Station Unit 2 is scheduled to end in May of 1995. Extension of the relief for these specific applications (addition of RCIC head spray flanges) through the end of the Inspection Interval would alleviate the need to generate an additional relief request if installation of the subject design changes were deferred from the upcoming fifth refueling outage(s) due to uncertainty in scheduling.