

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO REQUESTS FOR RELIEF FROM INSERVICE EXAMINATION REQUIREMENTS

DUQUESNE LIGHT COMPANY

OHIO EDISON COMPANY

PENNSYLVANIA POWER COMPANY

BEAVER VALLEY POWER STATION, UNIT NO. 1

DOCKET NO. 50-334

INTRODUCTION

Technical Specification 4.0.5 for the Beaver Valley Power Station, Unit No. 1 (Beaver Valley-1) states that inservice inspection (ISI) of ASME Code Class 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda, as required by 10 CFR 50.55a(g). 10 CFR 50 §50.55a(g)(6)(i) authorizes the Commission to grant relief from Code requirements upon making the necessary findings.

By letters dated October 25, 1983 and February 1, 1984, Duquesne Light Company (DLC or the Licensee) requested relief from visual examination requirements on sixteen Class 3 piping supports. No physical changes to the facility or equipment will be made as a result of this relief request.

EVALUATION AND DISCUSSION

The ASME Class 3 pipe hangers and supports are inservice inspected by DLC in accordance with the DLC visual examination procedure ISI-12.0. Of approximately 700 hangers or supports scheduled for inspection, relief from the ASME Code Section XI requirement for visual examination is requested for 16 due to their location in concrete, underwater or other inaccessible positions. The ASME Code Section XI provides that Visual Examination be performed per the ASME Code Section V, Article 9 which requires sufficient access to place the eye within 24 inches of the surface to be examined or the equivalent with remote devices.

The relief requests of October 25, 1983 and February 1, 1984 identify eleven and five supports, respectively. During field inspection (NRC inspection report number 50-334/84-02) the NRC inspector verified that visual examination meeting the requirement of the ASME Code Section V for distance to the examined surface could not be performed due to inadequate physical access.

The field observations are tabulated below.

Support	Problem	Support	Problem
H287C	In Concrete	H12	In Spent Fuel Pool Water
H290C	In Concrete	H21	In Spent Fuel Pool Water
H286	Underwater		
H135	In Concrete		
H137	In Concrete	H153	In Pipe Trench under other pipe
H287A	Remote from Platform	H154	In Pipe Trench under other pipe
H287B	Remote from platform	H155	In Pipe Trench under other pipe
H290A	Remote from platform	H8A	In Fuel Pool
H290B	Remote from platform	H57	In Fuel Pool

The inspector concluded that supports H287C, H290C, H135, H137, H153, H154 and H155 could not be examined or observed due to their position in concrete or location under other pipes.

The inspector noted that the requirement for access specified in the licensee's visual examination procedure ISI-12.0 and Article 9 of ASME Section V could not be met for the other nine supports. However, these supports that are remote from a platform or underwater could be observed periodically to determine evidence of loss of support capacity or restraint.

In the February 1, 1984 relief request the following alternative examination requirement was proposed by the Licensee as applicable to supports H153, H154, H155, H8A and H57.

"Perform a best effort visual examination utilizing the appropriate visual aids to improve the inspectability to the greatest extent possible. This best effort examination shall be done to detect any loss of support capability, and evidence of inadequate restraint."

Based on the inspector's field observation, the staff recognizes that a best effort visual examination as outlined above represents a suitable alternate examination plan and finds it as applicable to supports H286, H287A, H287B, H290A, H290B, H12 and H21. Relief from visual examination of supports H287C, H290C, H135 and H137 without performance of a best effort examination is provided as requested.

The NRC staff has verified that this relief request is consistent with requirements of 10 CFR 50.55a and NUREG-0800 (Standard Review Plan) Chapter 6, Section 6.6 for ISI of class 2 and 3 components. The staff further finds that the proposed Class 3 pipe support relief request will not involve any physical change to the plant safety related systems, components or structures, will not increase the likelihood of a malfunction of safety related equipment, will not

increase the consequences of an accident analyzed, nor create the possibility of a malfunction different from those previously evaluated. The staff therefore finds the licensee's relief request to be acceptable as modified by this safety evaluation.

A summary of the determinations made by the staff is presented as follows:

- A. Hangers for which full relief is granted from Section XI visual examination requirements.

H 287 C	H 135
H 290 C	H 137

- B. Hangers requiring alternative best-effort visual examination.

H 286	H 290 B	H 154
H 287 A	H 12	H 155
H 287 B	H 21	H 8 A
H 290 A	H 153	H 57

Environmental Considerations

Pursuant to 10 CFR 51.32, the Commission has determined that the granting of this Relief will have no significant impact on the environment (49 FR 32135).

Conclusion

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this relief request will not be inimical to the common defense and security or to the health and safety of the public.

Date: August 30, 1984

Principal Contributor:

E. H. Gray