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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUEST FROM PRESERVICE EXAMINATION FOR COMPONENT SUPPORTS

REQUIRED BY SECTION XI OF ASME BOILER & PRESSURE VESSEL CODE

TEXAS UTILITIES ELECTRIC COMPANY

DOCKET NO. 50-446

COMANCHE PEAK STEAM ELECTRIC STATION UNIT 2

INTRODUCTION

By letter dated March 31, 1992, as supplemented by letter dated June 1, 1992, the Texas Utilities Electric Company requested relief from the preservice visual examination of component supports (supports) required by Section XI of the ASME Boiler and Pressure Vessel Code (Section XI) for its Comanche Peak Steam Electric Station, Unit 2 (CP2). The applicant has performed or will perform alternative visual examinations of supports on four different occasions. The applicant has stated that the requirements for these examinations duplicate or exceed the requirements for the Section XI preservice visual examination of supports.

EVALUATION

IWF-2200 of Section XI requires that all supports undergo a preservice visual examination. It states:

a. All examinations listed in Table IWF-2500-1 shall be performed completely, once, as a preservice examination.

b. All examinations shall be performed following the initiation of hot functional tests (HFT).

The purpose of this visual examination of supports is to determine that they are correctly installed, maintain the system configuration, and are free of interference when activated. The examination should be accomplished while the system goes through the maximum temperature change, namely, as close to HFT as practical. Examinations shall be performed by qualified personnel and records shall be maintained in accordance with a Quality Assurance program.

The proposed alternative would permit the applicant to take credit for visual examinations of supports which have been or will be performed on four different occasions, to satisfy the code preservice inspection requirement. The applicant's proposed alternative inspections are:

1) During the initial construction phase when individual supports were installed. The purpose of this examination was to detect material, fabrication or installation defects.

2) At the end of the construction phase when the system was being certified. The purpose of this examination was to assure proper installation and maintenance of proper system configuration.

3) During HFT. The purpose of this examination is to determine whether the thermal movements are correctly and adequately predicted and to assure the proper functioning of the supports (i.e., to ascertain support clearances and verify that free movement is maintained).

4) At the time of system turnover to Operations. The purpose of this examination is to ensure proper installation, and removal of restraints.

Examinations have been or will be conducted by qualified personnel and the results shall be maintained by TU Electric in accordance with the QA program.

The NRC staff has reviewed the Section XI requirements and the applicant's proposed alternative program and has determined that the applicant's program essentially duplicates that of the required preservice examination and provides an acceptable level of quality and safety by ensuring proper installation, system configuration and functioning of the supports. Therefore, the proposed alternative to preservice examination of supports is considered acceptable.

CONCLUSION

The purpose of the preservice examinations required by Section XI is to visually assure the proper installation of supports. The alternative examinations proposed by the applicant are intended to accomplish the same purpose. The staff has reviewed the requirements for the support examinations and finds that the proposed alternative examinations are adequate to ensure correct installation, system configuration, and functioning of the supports.

Based upon its review of the applicant's submittal, the staff has concluded that the proposed alternative to the Code requirement for preservice visual examination of component supports is authorized pursuant to 10 CFR 50.55a (a)(3)(i) since it will provide an acceptable level of quality and safety.

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