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June 15, 1992
JAFP-92-0463

United States Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

SUBJECT: DOCKET NO. 50-333
LICENSEE EVENT REPORT: 92-022-00 - ASME Class III Pressure Tests Performed for 10 Minutes Vice 4 Hours

Dear Sir:

This report is submitted in accordance with 10 CFR 50.73(a)(2)(i).

Questions concerning this report may be addressed to Mr. W. Verne Childs at (315) 349-6071.

Very truly yours,

HARRY P. SALMON, JR.

HPS:WVC:KA:lar

Enclosure

cc: USNRC, Region 1
USNRC Resident Inspector
INPO Records Center

Cert No P064705488

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NRC FORM 366 (6-89) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

APPROVED OMB NO. 3150-0104
EXPIRES 4/30/92

ESTIMATED BURDEN PER RESPONSE TO COMPLY WITH THIS INFORMATION COLLECTION REQUEST: 50.0 HRS. FORWARD COMMENTS REGARDING BURDEN ESTIMATE TO THE RECORDS AND REPORTS MANAGEMENT BRANCH (P-630), U.S. NUCLEAR REGULATORY COMMISSION, WASHINGTON, DC 20555, AND TO THE PAPERWORK REDUCTION PROJECT (3150-0104), OFFICE OF MANAGEMENT AND BUDGET, WASHINGTON, DC 20503.

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
James A. FitzPatrick Nuclear Power Plant	0 5 0 0 0 3 3 3	1 OF 0 3

TITLE (4) ASME Class III Pressure Tests Performe per Later Editions of Code Without Relief Request (10-Minute Holu me vs. 4 Hours)

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES	DOCKET NUMBER(S)
										0 5 0 0 0
0 5	1 4	9 2	9 2	— 0 2 2	— 0 0	0 6	1 5	9 2		0 5 0 0 0

OPERATING MODE (9)	N	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)			
POWER LEVEL (10)	0 0 0	20.402(b)	20.405(c)	50.73(a)(2)(iii)	73.71(b)
		20.405(a)(1)(i)	50.36(c)(1)	50.73(a)(2)(iv)	73.71(c)
		20.405(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(v)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
		20.405(a)(1)(iii)	X 50.73(a)(2)(i)	50.73(a)(2)(vii)(A)	
		20.405(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
		20.405(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER
W. Verne Childs, Senior Licensing Engineer	AREA CODE 3 1 5 3 4 9 - 7 1 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	

SUPPLEMENTAL REPORT EXPECTED (14)		EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
YES (If yes, complete EXPECTED SUBMISSION DATE)	X NO				

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

EIIS Codes are in []
The plant was shutdown and in the cold condition for maintenance and refuel. On 5/14/92, it was determined that using later editions of the ASME Code to pressure test certain standby Class III piping systems without prior submittal of a relief request constituted a reportable condition prohibited by the plant Technical Specifications. A 10-minute functional test, allowed by the ASME 1983 Edition, was used to inspect emergency service water [BI] and emergency diesel generator [EK] piping for leakage in lieu of a 4-hour inservice test as required by the version of code committed to within the plant ISI Program (ASME 1980 with Winter 1981 Addenda). The reduced hold time eliminated standby system operating hardships which are deemed technically unnecessary. The Power Authority failed to submit a relief request prior to implementation of the test method change because of NRC endorsement of the 10-minute functional test through later editions of the ASME Code. All ASME Class III pressure test procedures, with the exception of the emergency diesel generator test, were changed to require a 4-hour minimum run time. An official request for relief will be submitted to the NRC for pressure testing Class III systems to the later edition of ASME, and to clarify emergency diesel generator piping system functional pressure test requirements.

EIIS Codes are in []

Description

On May 14, 1992, with the plant in a cold shutdown condition for refueling and maintenance, it was determined that a reportable condition had resulted by using 10-minute hold times instead of 4 hours to leak test ASME Class III piping in systems that are normally not in service, without first submitting a relief request to the Commission. The 10-minute functional test is permitted by the 1983 Edition of ASME, but not by the 1980 Edition (with 1981 Winter Addenda) on which the plant ISI Program is based. Using the later edition of the ASME Code without prior NRC approval may be a violation of Technical Specification 4.6.F.1 in that the ASME Code utilized differed from the NRC approved edition in effect 12 months or less prior to the beginning of the ISI inspection interval. The ASME Section XI 1980 Edition only allows a hydrostatic or 4-hour inservice pressure test for Class III piping. Both of these pressure tests present equipment and staff hardships which are deemed technically unnecessary. Class III cooling water systems for the plant were designed and constructed prior to the issuance of the first code addressing Class III components. As a result, isolation valves that would permit hydrostatic testing were not installed. Also, the intent of the code is to permit use of a 4-hour inservice test for systems that are running during normal plant operation. The Class III systems involved are not normally in service, thus an inservice test would require an excessively long period of system operation to meet the pressure test requirement.

The discrepancy was first identified by QA (Quality Assurance) on July 1, 1991 while reviewing the ASME pressure test procedure for the emergency service water system [BI], and brought to the attention of management. The ISI coordinator responded on August 2, 1991 by stating that later editions of ASME could be utilized for clarification of Section XI pressure test hold times. QA rejected this response on August 19, 1991 based on ISI Program commitments to the earlier code. On April 8, 1992, QA identified another case of incorrect ASME Class III pressure testing on emergency diesel generator [EK] support systems (i.e., fuel oil and combustion air piping). Again, the system was being operated for 10 minutes instead of 4 hours before a visual check for leaks was performed. On April 27, 1992, the company committed to preparation of a relief request for later code applicability on Class III pressure testing after a review by the Authorized Nuclear Inservice Inspector (ANII) recommended use of the later code provided concurrence from the NRC is obtained.

Cause

The event was caused by the failure to submit a relief request prior to implementing a test methodology change which had already been approved by ASME through later editions of the code. The ISI Coordinator and plant Operations Department assumed that later editions of the ASME Code became applicable and could be used to clarify testing requirements accepted for industry use.

Analysis

Performing a pressure test for a duration of 10 minutes as opposed to 4 hours on Class III systems that are not normally in service is technically acceptable as approved by ASME through later editions of the code. The NRC has endorsed the 10-minute functional test method for Class III systems through the 1989 ASME Code and the ANII acknowledges and recommends its use. Prolonged operation of standby systems can present hardships on equipment which are not necessary to attain the conditions required for visual leak inspection. The Class III systems were adequately tested to the most recent ASME requirements and do not constitute an operability problem.

This report is submitted pursuant to the reporting requirements of 10 CFR 50.73(a)(2)(i)(B).

Corrective Action

1. A relief request for the use of 10-minute functional tests on Class III systems, and clarification of pressure test requirements for emergency diesel generator piping systems, will be submitted to the NRC using later editions of the ASME Code as justification (due date prior to start-up from the current outage. In the interim, all ASME Class III pressure test procedures, with the exception of the emergency diesel generator test, have been revised to incorporate a 4-hour minimum operating peri The emergency diesel generator support piping is considered an augmented system and will be addressed separately in the relief request.

2. The ISI program will be updated to require NRC relief requests be obtained for use of later code editions or addenda for inspection of components (due date December 31, 1992).

Additional Information

Failed Components: None

Previous Similar Events: None