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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE FIRST TEN-YEAR INTERVAL

INSERVICE INSPECTION PROGRAM PLAN

TEXAS UTILITIES ELECTRIC COMPANY

COMANCHE PEAK STEAM ELECTRIC STATION, UNIT 1

DOCKET NO. 50-445

1.0 INTRODUCTION

By letter dated October 15, 1990 and supplemented by letters dated October 16, 1991, and January 24, 1992, TU Electric (the licensee) submitted the Comanche Peak Steam Electric Station, Unit 1 (CPSES) first ten-year interval Inservice Inspection (ISI) program to meet the requirements of the 1986 Edition of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code. The staff, with technical assistance from its contractor, Idaho National Engineering Laboratory, EG&G Idaho, Inc. (EG&G), has evaluated the first ten-year interval ISI program plan, and the requests for relief from certain ASME Code requirements determined to be impractical for CPSES during the first inspection interval.

Technical Specification 4.0.5 for CPSES states that the surveillance requirements for ISI of the ASME Boiler and Pressure Vessel Code, Class 1, 2, and 3 components shall be applicable as follows: ISI of ASME Code Class 1, 2, and 3 (including supports) 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), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(a)(3)(i), (a)(3)(ii) or (g)(6)(i).

Pursuant to 10 CFR 50.55a(g), ISI of ASME Code Class 1, 2, and 3 components (including supports) shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where specific written relief has been requested by the licensee and granted by the Commission pursuant to 10 CFR 50.55a(3)(i), (a)(3)(ii), or (g)(6)(i). In requesting relief, the licensee must demonstrate that (1) the proposed alternatives provide an acceptable level of quality and safety; (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety; or (3) conformance with certain requirements of the applicable Code edition and addenda is impractical for its facility.

Section 50.55a(a)(3)(i), (a)(3)(ii), and (g)(6)(i) of Title 10 of the Code of Federal Regulations authorizes the Commission to grant relief from these requirements upon making the necessary findings or impose alternative

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requirements that are determined to be authorized by law, will not endanger life or property or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed. The NRC staff's findings with respect to granting or not granting the relief requested as part of the licensee's ISI program are contained in the Safety Evaluation (SE) issued on the licensee's program.

The ISI program addressed in this report covers the first ten-year inspection interval from February 8, 1990 to February 8, 2000. The licensee's program includes ISI program, Revision 0, as described in letters dated October 15, 1990, October 16, 1991, and January 24, 1992.

2.0 EVALUATION

The ISI program and the requests for relief from the requirements of Section XI have been reviewed by the staff with the assistance of its contractor, EG&G. The Technical Evaluation Report (TER) provided as Attachment 2 is EG&G's evaluation of the licensee's inservice inspection program and relief requests. The staff has reviewed the TER and concurs with, and adopts, the evaluations and conclusion contained in the TER. A summary of the relief request determinations is presented in Table 1. The granting of relief is based upon the fulfillment of any commitments made by the licensee in its basis for each relief request and the alternative proposed testing.

3.0 CONCLUSION

Based on the review of the licensee's ISI program relief requests, the staff concludes that the relief requests as evaluated by this SE will provide reasonable assurance of the operational readiness of the components (including supports) to perform their safety related functions. The staff has determined that granting relief, pursuant to 10 CFR 50.55a(g)(6)(i), is authorized by law and will not endanger life or property, or the common defense and security and is otherwise in the public interest. In making this determination the staff has considered the alternate testing being implemented, compliance resulting in a hardship without a compensating increase in safety, and impracticality of performing the required testing considering the burden if the requirements were imposed.

The ISI program relief requests for Comanche Peak Unit 1 provided by letters dated October 15, 1990, October 16, 1991, and January 24, 1992, are acceptable for implementation. New or revised relief requests contained in any subsequent revisions may not be implemented without prior approval by NRC.

Attachments:
1. Table 1
2. EG&G TER EGG MS-10141

Principal Contributor: D. Smith

Date: October 1, 1992

Comanche Peak Steam Electric Station, Unit 1
First 10-Year ISI Interval

TABLE 1
SUMMARY OF RELIEF REQUESTS

Relief Request Number	System or Component	Exam Category	Item No.	Volume or Area to be Examined	Required Method	Licensee Proposed Alternative	Relief Request Status
B-1	Reactor Coolant Piping	B-P	B15.50	RCS piping between RPV and biological shield wall RCS piping within biological shield wall penetrations	VT-2 visual exam during system leakage test	None. Surrounding areas will be examined for leakage	Granted Relief not required
C-1	Containment Spray Piping	C-C	C3.20	Integrally welded attachments to piping: Support Number 16-CT-024-003-S22R	Surface exam	None. Surface exam to extent practical	Granted
D-1	Reactor Coolant Pump			Thermal Barrier Heat Exchanger	Hydrostatic test per IWC-5223(a)	Hydrostatic test based on design pressure of adjacent components	Granted

ATTACHMENT 1