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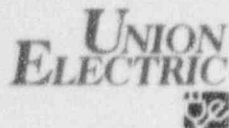
May 12, 1997

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US NRC

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June 27, 1997

Rules and Directives Branch  
DAS, Office of Administration  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

ULNRC-3606

Gentlemen:

**DOCKET NUMBER 50-483  
CALLAWAY PLANT UNIT 1  
FACILITY OPERATING LICENSE NPF-30  
DRAFT REGULATORY GUIDES DG-1048, DG-1049, AND DG-1050**

This letter documents Union Electric's comments on the May, 1997 Division 1 Draft DG-1048 (Proposed Revision 31 to Regulatory Guide 1.84), Draft DG-1049 (Proposed Revision 31 to Regulatory Guide 1.85), and Draft DG-1050 (Revision 12 to Regulatory Guide 1.147).

DG-1050, ASME Code Case N-416-1, "Alternative Pressure Test Requirements for Welded Repairs or Installation of Replacement Items by Welding, Class 1, 2, and 3."

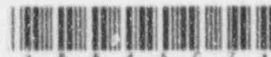
Page 6 of DG-1050 requires, in addition to N-416-1 provisions, a root pass surface examination for ASME Class 3 pressure retaining welds. Section 1.2.1 of the "Value/Impact Statement" (page 19 of DG-1050) provides the rationale for this added requirement. Union Electric considers this root-pass surface examination unwarranted. Bases for this position are documented in items 1 and 2 below.

1. "Value/Impact Statement" paragraph 1.2.1 states: "...The staff does not believe that eliminating the hydrostatic pressure testing and only performing system pressure testing is an acceptable alternative to the hydrostatic testing..." N-416-1 is based on research demonstrating that ASME Section XI hydrostatic test pressures (1.10 to 1.25 times design) do not provide a meaningful assessment of structural integrity. N-416-1 permits, in lieu of hydrostatic testing, a system leakage test at normal operating pressure. This system leakage test is, in many ways, superior to a hydrostatic test. For example, a hydrostatic test exposes a system to slow, uniform pressurization under

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controlled conditions. System pressure is carefully raised, test pressure is held constant for a short period of time (often 10 minutes), and the system is depressurized. Conversely, an inservice leakage test exposes the system to heat-up, vibration, thermal growth, and various other conditions encountered only during system operation. Substitution of an inservice leakage test for a hydrostatic test is not considered a reduction in requirements and does not, therefore, warrant imposition of the added requirement for root pass surface examination.

2. "Value/Impact Statement" paragraph 1.2.1 states: "The Chairman of Pressure Testing Subgroup on ASME was informed that the NRC would not accept the Code Case without the exception in the endorsement. However, the ASME passed the Case without the changes requested by the NRC." The Chairman of the Pressure Testing Subgroup cannot add Code requirements without first gaining ASME consensus approval. In this instance, the Subgroup Chairman attempted to revise N-416-1 to add the requested root pass surface examination. ASME Section XI rejected this revision in a near-unanimous vote. Reasons for this rejection included:

- a) The intent of ASME Class 3 welds coupled with inservice leakage testing provides assurance that welds are leak-tight. This level of assurance equals (or exceeds) that provided by a hydrostatic test.
- b) A root pass surface examination increases costs without a commensurate weld quality increase.

#### DG-1050, ASME Code Case N-522, "Pressure Testing of Containment Penetration Piping"

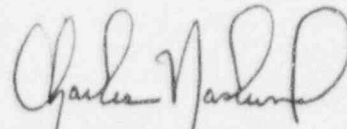
Page 9 of DG-1050 imposes, in addition to N-522 requirements, the requirement that "The test should be conducted at the peak calculated containment pressure and the test procedure should permit the detection and location of through-wall leakage in containment isolation valves (CIVs) and pipe segments between the CIVs." Section 1.2.5 of the "Value/Impact Statement" provides justification only for performing the test at the peak calculated containment pressure. No justification or explanation is provided for the requirement that "the test procedure should permit detection and location of through-wall leakage in containment isolation valves (CIVs) and pipe segments between the CIVs." Union Electric considers the Appendix J, Type C test to be an adequate verification of containment leakage, and considers the additional restriction unwarranted. This restriction reduces Code Case usability and increases associated costs. Since DG-1050 contains no justification for this added requirement, Union Electric requests that NRC remove this restriction.

DG-1048, DG-1049, and DG-1050 General Comment

Revision 11 to Regulatory Guide 1.147 was issued in October, 1994. Code Case N-541 (approved 6/9/95) is the most recent Case endorsed in draft Regulatory Guide 1.147 Revision 12. Code Cases provide a vehicle for timely utility access to ASME Code changes/alternatives. Urgent industry needs are frequently addressed using Code Cases. Delays in regulatory guide revisions necessitate site-specific utility requests for NRC Code Case approval. These requests divert both utility and NRC resources. Improvements in timely NRC issue of Regulatory Guide revisions are necessary to provide efficient utility access to Code Case provisions.

If you have any questions concerning this letter, please contact us.

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