

Log # TXX-94332 File # 10010.1 905.4 (clo) Ref. # 10CFR50.55a(g)(5)(iii)

December 21, 1994

C. Lance Terry Group Vice President

U. S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555

SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES) - UNIT 2 DOCKET NO. 50-446 RELIEF REQUESTS TO THE UNIT 2 INSERVICE INSPECTION PROGRAM (1986 EDITION OF ASME CODE, SECTION XI, NO ADDENDA, INTERVAL START DATE: AUGUST 3, 1993, FIRST INTERVAL)

REF: 1) NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants, Draft Report for Comments," November 1993

- 2) TU Electric Letter logged TXX-93290 from William J. Cahill, Jr. to the NRC, dated September 23, 1993
- 3) NRC Safety Evaluation of Requests for Relief to the First Ten-Year Interval Inservice Inspection Program Plan for Comanche Peak Steam Electric Station, Unit 1 (TAC No. M87765), dated July 26, 1994

Gentlemen:

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PDR

TU Electric has determined that certain inspection requirements of Section XI of the ASME are impractical and is requesting relief in accordance with the requirements of 10CFR50.55a(g)(5)(iii) and consistent with the guidelines of draft NUREG-1482 (Reference 1). This transmittal submits relief requests A-1 and A-2 (Revision 1) (Attachments 1 and 2 respectively). These relief requests have been implemented pending your approval. These requests are identical to requests submitted for Unit 1 (Reference 2) and incorporates a condition added by the NRC approval of the Unit 1 relief requests (Reference 3).

400 N. Olive L.B. 81 Dallas, Texas 75201

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If you have any questions, please contact Mr. Carl B. Corbin at (214) 812-8859.

Sincerely.

C. L. Terry

anhall By:

9. S. Marshall Generic Licensing Manager

CBC:cc Attachments

Mr. L. J. Callan, Region IV
Mr. D. D. Chamberlain, Region IV
Mr. T. J. Polich, NRR
Mr. G. Bynog, TDLS
Resident Inspector, CPSES

Attachment 1 to TXX-94332
Page 1 of 1

RELIEF REQUEST A-1

A. Item(s) for which relief is requested:

Pressure retaining bolted connections.

B. Item(s) Code Class:

1, 2 and 3

C. Examination requirement from which relief is requested:

ASME Section XI 1986 Edition no Addenda.

Subparagraph IWA-5250 (a) (2) requires bolting to be removed and VT-3 visually examined for corrosion when leakage occurs at a bolted connection.

D. Basis for relief:

The time and radiation exposure associated with removal of all bolting at a connection is not warranted to determine the condition of the bolted connection. Removal of 1 bolt at the position closest to the leakage source will reveal sufficient evidence to indicate the overall condition of the bolted connection.

Leakage does not typically occur in a uniform pattern around a bolted connection, but rather in a localized area along the perimeter. The bolt closest to the leakage source will be most susceptible to damage.

E. Alternate examinations:

It is proposed that subparagraph IWA-5250 (a) (2) of the 1990 Addenda be utilized in lieu of this same paragraph from the 1986 Edition. The 1990 Addenda allows for removal and examination of the bolt closest to the leakage source. Examination of the remaining bolting is contingent upon the condition of the examined bolt.

F. Anticipated impact on the overall level of plant quality and safety:

None

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NOTES: (FC) - First Class Mail

IR - Inspection Reports

NODIL - Correspondence related to material/component acceptability.

VENDOR - Vendor documents per STA-296 (Vendor Document Group or VETIP Coordinator).

IOER - NRCB, GL and IN

ORC - Part 21 Submittals, Incoming Part 21 notifications, LER, and description letters for changes to licensing basis documents.
PUC - Monthly Operating Report, Notices of Civil Penalty, SALP Reports and LERs

G. MCGEE

November 3, 1994

If revisions are required to distribution or distribution sheet, contact Gayle Peck (812-8219), Don Woodlan (812-8225) or John Marshall (812-8220).

Attachment 2 to TXX-94332 .Page 1 of 2

RELIEF REQUEST A-2 REVISION 1

A. Item for which relief is requested:

Insulated bolted connections in systems which are borated for the purpose of controlling reactivity.

B. Item Code Class:

1

C. Examination requirement from which relief is requested:

ASME Section XI 1986 edition, no Addenda.

Subparagraph IWA-5242 (a) requires that, "for systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure retaining bolted connections for visual examination VT-2".

D. Basis for relief:

System leakage tests are conducted when the Class 1 pressure boundary is raised to nominal operating pressure and temperature as part of normal startup following a refueling outage. Removal and reinstallation of insulation under nominal operating temperature creates a hardship due to the extreme heat. Cooling down to a temperature of 200°F, as allowed by IWA-5245 would unduly extend the outage duration due to heatup/cooldown rates, as well as introduce additional thermal cycles. Additionally, radiation levels are typically higher during startup than during shutdown.

Significant leakage from insulated bolted connections will be apparent at exposed insulation joints and surfaces and would be detected during a VT-2 examination of these insulation joints and surfaces.

Programs which were developed in response to Generic Letter 88-05 are currently in place to address the potential for corrosion of carbon steel portions of the reactor coolant pressure boundary when exposed to concentrated boric acid. Examinations conducted in accordance with ASME Section XI, designed to detect boric acid corrosion of the primary system serve to enhance these programs but are not required to ensure effective programs. Attachment 2 to TXX-94332
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RELIEF REQUEST A-2 REVISION 1 (cont.)

E. Alternative examinations:

It is proposed that rather than removing/installing insulation at bolted connections during the inservice leak test performed at plant startup, the insulation shall be removed and the connection examined during refueling. The bolted connection shall be examined for evidence of leakage during each refueling outage by VT-3 certified personnel. Any evidence of leakage will be evaluated in accordance with IWA-5250 (a) (2). During the inservice leak test, the exposed insulation surfaces and joints at bolted connections shall be examined via a VT-2 examination to ensure that no significant leakage exists. To assure that adequate time has elapsed to allow leakage from the subject bolted connections to migrate through the insulation, the inservice leak test hold time at nominal operating pressure shall be extended to 4 hours.

F. Anticipated impact on the overall level of plant quality and safety:

None