



CHARLES CENTER · P. O. BOX 1475 · BALTIMORE, MARYLAND 21203

JOSEPH A. TIERNAN  
VICE PRESIDENT  
NUCLEAR ENERGY

April 22, 1988

U. S. Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant  
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318  
Request for Permission to Apply ASME Boiler and Pressure Vessel Code  
Case N-416

---

REFERENCES: (a) Regulatory Guide 1.147, Inservice Inspection Code Case  
Acceptability, ASME Section XI, Division 1, Revision 5,  
August 1986

(b) Updated Final Safety Analysis Report, Calvert Cliffs Nuclear Power  
Plant, Unit Nos. 1 and 2, Section 4.1.3.2 Steam Generators

(c) Proposed Rule, Codes and Standards for Nuclear Power Plants,  
10 CFR 50, Federal Register Notice 52 FR 24015, dated  
June 26, 1987

Gentlemen:

In accordance with 10 CFR 50.55a(a)(3) and Reference (a), we are requesting permission to apply, if needed, ASME Boiler and Pressure Vessel Code Case N-416 without exception for Unit No. 1 during the current refueling outage. The use of this Code Case would only be applied for Class 2 piping and those situations defined in Case N-416. We are asking for permission to apply this Code Case on an as needed basis now to avoid a possible emergency request during the outage. Footnote 6 to 10 CFR 50.55a permits the use of Code Cases upon authorization by the Director of the Office of Nuclear Reactor Regulation.

Following repair or replacement of a section of Class 2 piping, we are required by IWA-4400 to perform a hydrostatic pressure test on the portion of pipe repaired or replaced. The performance of this test would be impractical for those lines of pipe that are unisolable from an associated steam generator. The steam generator would experience an unnecessary pressure transient above its design pressure as a result. The operational lifetime of our steam generators is limited by the number of times they are permitted to be hydrostatically pressure tested above design pressure (see Reference b).

8805020201 880422  
PDR ADOCK 05000317  
P PDR

A047  
w/checked \$150  
#1916269

The performance of any hydrostatic pressure test that is unisolable from the associated steam generators would result in hardship without a compensating increase in the level of safety and quality because of the pressure transient above the steam generator design pressure. Reference (a) states that the deferral of this hydrostatic pressure test is acceptable for Class 2 piping contingent upon the performance of the alternate tests required in Code Case N-416.

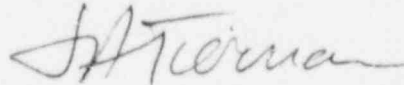
In accordance with Case N-416 we will perform the VT-2 visual examination for leakage and the Article IWA-2220 surface examinations for partial penetration welds or the Article IWA-2230 volumetric examinations for full penetration welds. These alternative examinations will provide an adequate assurance of the integrity of the welds for the Class 2 piping in question. Any Class 2 lines repaired or replaced will be hydrostatically tested at the next regularly scheduled system hydrostatic test (IWC-5000).

Permission to apply the Code Case N-416 is being requested in anticipation of repairs and/or replacement of Class 2 piping during the current outage. The Unit 1 refueling outage is presently scheduled to be complete at the end of May. Authorization to defer hydrostatic testing will be needed by then.

Pursuant to 10 CFR 170.21, BG&E Check No. 1916269 in the amount of \$150.00 is enclosed.

Should you have any further questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



JAT/SRC/dlm

Attachment

cc: D. A. Brune, Esquire  
J. E. Silberg, Esquire  
R. A. Capra, NRC  
S. A. McNeil, NRC  
W. T. Russell, NRC  
D. C. Trimble, NRC