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CHARLES H. CRUSE
MANAGER
NUCLEAR ENGINEERING SERVICES DEPARTMENT

September 15, 1988

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 1; Docket No. 50-317
Request for Relief from ASME Code Section XI Requirements

REFERENCE: (a) NRC Staff Guidance Letter on ASME Relief Requests, dated
November 24, 1976

Gentlemen:

In accordance with 10 CFR 50.55a(g)(i), we are requesting schedule relief from an ASME Code Section XI requirement. The information concerning this relief request is presented herein as required by Reference (a).

The submittal of an Owner's Report for Repairs or Replacements, Form NIS-2, with the Inservice Inspection Summary Report, required within 90 days following the outage, is impractical. We request an extension to the submittal of 30 days, to November 1, 1988, for Form NIS-2 only. The remaining information required to be with the Summary Report by ASME Code Section XI IWA-6230 will be submitted within 90 days following the outage.

I. Components for Which Relief is Requested

Relief is not requested from any component inspection, evaluation or examination. However, IWA-6220(b)(0) requires a Form NIS-2 in the Summary Report. We are requesting to delay by 30 days the submittal of that form. All other requirements of IWA-6220/6230 will be met on time.

II. ASME Requirement from Which Relief is Requested

ASME Code Section XI 1983 edition with Addenda through summer 1983, paragraph IWA-6230, requires submitting a Summary Report (as defined in IWA-6220) 90 days after the completion of an outage. This Summary Report is currently due October 2, 1988. We are requesting an additional 30 days to prepare and submit Form NIS-2.

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PDR ADOCK 05000317
PDC

A047
w/ check #150
#1918244

III. Basis for Relief

We recently started our second 10-year-interval Inservice Inspection Program. In accordance with 10 CFR 50.55a, we upgraded to ASME Code Section XI 1983 edition with Addenda through summer 1983. Because of this, we implemented many new requirements, including a Repair and Replacement Program.

We are now required to prepare and submit within 90 days a Form NIS-2 with our Summary Report, a form which we have never prepared before. Because of the large magnitude of the job of completing this form, including allowing adequate time for reviews of the great number of jobs performed and resolving concerns, it will not now be possible to meet the October 2, 1988 deadline. Therefore, the IWA-6230 requirement to submit Form NIS-2 within 90 days is deemed impractical for this occasion.

Without a 30-day extension for submitting Form NIS-2, we cannot comply with our applicable ASME Code Section XI requirements.

IV. Alternative Testing

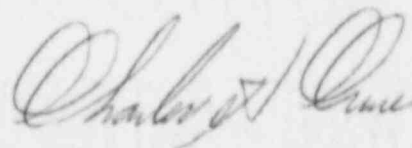
Due to the nature of our relief request, no alternate testing will be proposed. However, we agree to submit, no later than November 1, 1988, the completed Form NIS-2.

This relief is requested prior to October 2, 1988, which is when the Summary Report is currently due.

Pursuant to 10 CFR 170.21 we are including BG&E Check No. 1918244 to the NRC in the amount of \$150.00 to cover the fee for this request.

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

Very truly yours,



CHC/DLS/dlm

Attachment

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September 15, 1988
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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
T. Magette, DNR