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L-99-175

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
ISI (Inservice Inspection) Program Relief Request

In accordance with 10 CFR 50.55a(a)(3), this submittal requests NRC review and approval of a proposed alternative request applicable to the Ten-Year ISI Programs for BVPS Unit 1 and BVPS Unit 2.

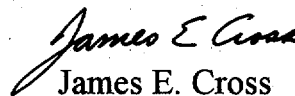
Relief Request BV3-IWE1-1, Rev. 0 is attached for your review. This request seeks relief from conducting a VT-3 visual examination on seals and gaskets.

Per 10 CFR 50.55a(g)(6)(ii)(B), these examinations are required to be completed by September 9, 2001. Due to changes in the scheduling of future BV-1 refueling outages, these examinations would now need to be conducted in the Thirteenth Refueling Outage (1R13), rather than in 1R14 as originally planned.

Therefore, implementation of Relief Request BV3-IWE1-1 would begin at BVPS Unit 1 in the current Third Ten-Year ISI Interval, commencing with 1R13 scheduled for February 2000; and at BVPS Unit 2 in the current Second Ten-Year ISI Interval, commencing with the Eighth Refueling Outage (2R08) scheduled for September 2000. Accordingly, NRC action concerning this submittal is requested prior to February 2000, in order to support this schedule.

If you have any questions regarding this submittal, please contact Mr. Mark S. Ackerman at (412) 393-5203.

Sincerely,


James E. Cross

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Enclosure

c: Mr. D. S. Collins, Project Manager
Mr. D. M. Kern, Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator



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Beaver Valley Power Station
Unit Nos. 1 and 2

RELIEF REQUEST NO. BV3-IWE1-1, Rev. 0

COMPONENTS

This request is applicable to seals and gaskets of ASME Class MC Components.

ASME CODE REQUIREMENTS

Examination Category E-D, Item Nos. E5.10 and E5.20 of Table IWE-2500-1, ASME, Boiler and Pressure Vessel (B&PV) Code, Section XI, 1992 Edition, 1992 Addenda, as amended by 10CFR Part 50.55a, requires that seals and gaskets on air locks, hatches, and other devices receive a VT-3 visual examination once each interval to ensure containment leak-tight integrity.

RELIEF REQUESTED

Relief is requested from conducting the VT-3 examinations on seals and gaskets.

BASIS FOR RELIEF

The leak tight integrity of resilient seals and gaskets is periodically verified by the 10CFR50, Appendix J, Primary Containment Leakage Program. Also, in the 1993 Addenda of ASME Section XI, Table IWE 2500-1, Category E-D, Note 1, has been revised to not require disassembly of the connections solely for the purpose of conducting examinations.

- Electrical penetrations

Two types of electrical penetration assemblies are used: canister and unitized header. All electrical penetration assemblies are fabricated and tested in accordance with the ASME B&PV Code. These seals and gaskets cannot be inspected without the disassembly of the penetration to gain access to the seals and gaskets. All penetration assemblies are leak tested in accordance with 10CFR Part 50 Appendix J, Option B.

- Air locks

The Personnel and Emergency Air Locks utilize inner and outer doors with double gasket surfaces to ensure leak tight integrity. These air locks also contain other gaskets and seals, such as the handwheel shaft seals, electrical penetrations, blank flanges, and equalizing pressure connections which require disassembly to gain access to the gaskets and seals. All of these assemblies are leak tested in accordance with 10CFR Part 50 Appendix J, Option B.

- Equipment Hatch

The equipment hatch utilizes a double gasket to ensure leak tight integrity. The equipment hatch is currently leak tested in accordance with 10CFR Part 50 Appendix J, Option B.

- Containment penetrations

Containment penetrations whose design incorporates resilient seals, or gaskets are: Containment purge blind flanges, fuel transfer tube blind flanges, and other penetrations that contain gaskets and seals which require disassembly to gain access to the gaskets and seals. These penetrations are currently leak tested in accordance with 10CFR Part 50 Appendix J, Option B.

The examination of seals and gaskets requires that the joints, which are proven adequate through Appendix J leak rate tests, be disassembled. For the electrical penetrations, this involves a pre-maintenance Appendix J leak rate test, and disconnecting cables at electrical penetrations. If enough cable slack is not available, disassembly of the joint, removal and examination of the seals and gaskets, reassembly of the joint, reconnecting the cables if necessary, post-maintenance testing of the cables, and then a post-maintenance Appendix J leak rate test of the penetration would be required.

For the Containment Personnel and Emergency Air Locks, blind flanges, and the Equipment Hatch, the work required would be similar except for the disconnecting, reconnecting, and testing of cables. This imposes the risk that equipment could be damaged. As identified above, the ASME B&PV Code, Section XI, 1992 Edition, 1993 Addenda, recognizes that disassembly of joints to perform these examinations is not warranted. Examination Category E-D was modified to state that sealed or gasket connections need not be disassembled solely for performance of examinations. However, without disassembly, most of the surface of the seals and gaskets are inaccessible. When these assemblies are tested in accordance with 10CFR Part 50, Appendix J, degradation of the seal or gasket material is identified by an increase in the leakage rate. Corrective measures are applied and the component re-tested.

On the basis of the above information, a VT-3 examination of seals and gaskets in accordance with Section XI constitutes a burden without a compensating increase in quality or safety. Testing the seals and gaskets in accordance with 10CFR Part 50, Appendix J provides acceptable assurance of the leak-tight integrity of the seals and gaskets. (Reference 10CFR50.55a(a)(3).)

PROPOSED ALTERNATIVE

The leak-tight integrity of seals and gaskets is verified with the 10CFR Part 50, Appendix J, Primary Containment Leakage Testing Program.

IMPLEMENTATION SCHEDULE

This relief request is applicable to the initial interval of the Containment Inspection Program.