

December 21, 2000

MEMORANDUM TO: Geoffrey E. Grant, Director
Division of Reactor Projects
Region III

FROM: Suzanne C. Black, Deputy Director */RAI/*
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: TASK INTERFACE AGREEMENT (TIA 2000-13) - REQUEST FOR
TECHNICAL ASSISTANCE - COMMONWEALTH EDISON COMPANY'S
INTERPRETATION OF ASME CODE REQUIREMENTS FOR LASALLE
STATION

Requested Action

By memorandum dated August 16, 2000, Region III requested technical assistance from the Office of Nuclear Reactor Regulation (NRR) related to repair activities and testing of Class 1 piping at LaSalle County Station. In February 2000, the LaSalle, Unit 1, reactor core isolation cooling (RCIC) injection valve developed a pressure seal bonnet leak. The valve was an American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section III, Class 1, valve that was part of the reactor coolant pressure boundary and a primary containment isolation valve. The licensee installed a new valve upstream of the leaking valve, extending the ASME Code, Class 1, pressure boundary by 8 feet. Therefore, the 8-foot section of pipe was upgraded by the licensee from Class 2 to Class 1. The applicable ASME Code section requires that the section of piping being upgraded be examined by one of the following methods:

- (1) Ultrasonic examination of the entire volume of metal in the product;
- (2) Eddy current examination of the entire volume of metal in the product;
- (3) Magnetic particle or liquid penetrant examination of all external surfaces and accessible internal surfaces; or
- (4) Radiography of the entire volume of metal in the product.

The licensee stated that it upgraded the 8-foot section of piping on May 25, 2000, using option (3), above. Because the piping had not been cut open at that time, the licensee was only able to perform the examination on the external surfaces. On May 30 and 31, 2000, the licensee cut open the pipe to install the new valve. The licensee stated that, because this was a separate and distinct activity, and the piping upgrade had been completed, it was not obligated to perform the examination of the internal portions of the pipe that were now accessible.

Region III disagreed with the licensee's conclusion that these could be treated as separate and distinct activities and that a magnetic particle or liquid penetrant examination should have been performed on the internally accessible surfaces. The licensee subsequently performed an expanded ultrasonic examination of the upgraded piping (Option 1, above).

Response

The staff agrees that all of the activities associated with installation of the RCIC injection valve should be considered as parts of one repair/replacement activity and not as separate and distinct activities. It is the staff's view that, if a licensee chooses to perform Option (3) from ASME Code, Section III NB-2551(a), then the intent of the code would be to examine the accessible internal surfaces of the pipe if they become available.

However, the staff has concluded that, because the licensee performed another acceptable option of the ASME Code for upgrading the piping (expanded ultrasonic examination) in response to regional staff questions, the requirements of the ASME Code were met and there are no safety concerns associated with this activity.

cc: A. Randolph Blough, RI
Loren R. Plisco, RII
Kenneth E. Brockman, RIV

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