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U. S. Nuclear Regulatory Commission
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SUBJECT: COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)
DOCKET NOS. 50-445 AND 50-446
REQUEST TO INVOKE CODE CASE N-498-2
(1986 EDITION OF ASME CODE, SECTION XI, NO ADDENDA;
UNIT 1 INTERVAL DATES:
AUGUST 13, 1990 - AUGUST 13, 2000, FIRST INTERVAL;
UNIT 2 INTERVAL DATES:
AUGUST 3, 1993 - AUGUST 3, 2003, FIRST INTERVAL)

Via this letter TXU Electric requests approval to utilize Code Case N-498-2 "Alternative Requirements for 10-Year System Hydrostatic Testing for Class 1, 2 and 3 Systems Section XI, Division 1". CPSES has invoked Code Case N-498-1 for systems as permitted by Regulatory Guide (RG) 1.147 "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1". Application of Code Case N-498-2 at CPSES will be an alternative to ASME Section XI 1986 Edition, no Addenda pursuant to the rules of 10CFR50.55a. The revision 2 of N-498 (N-498-2) modifies hold time requirements and is not yet incorporated into RG 1.147. The ASME consensus process has approved Code Case N-498-2, with NRC participation in this process. Invoking this Code Case will not decrease the acceptable level of quality and safety at CPSES.

TXU Electric wishes to use Code Case N-498-2 at Comanche Peak Steam Electric Station (CPSES), on a system specific basis for portions of the Safety Injection (SI) system only, for the following reasons. The ASME Section XI system pressure test for the SI hot leg and cold leg injection paths to the nonisolable ASME Safety Class 1 main loop piping is performed in conjunction with the emergency core cooling system (ECCS) check valve forward flow functional testing. This ECCS check valve forward flow functional test is performed periodically during refueling outages by putting the plant in various non-standard operating system lineups. For each of these lineups, water is transferred from the reactor water storage tank (RWST) through the safety

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injection system and eventually into the reactor vessel and the reactor refueling cavity. Limits exist for low RWST level and high refueling cavity level. The test can only be run in segments during reactor cavity fill sequences. In order to maintain these water level limits and to complete all of the injection path segments, the duration for each injection path functional test is shorter than the hold time required by Code Case N-498-1. It is requested that the time required to perform the ECCS check valve forward flow functional test be sufficient for the ASME Section XI system pressure test holding time prior to performing the VT-2 visual examination. If this duration time is sufficient to adequately verify a system's readiness to perform its function in its required mode of operation, then that duration should also be sufficient to satisfy system pressure test requirements.

Compliance with the hold times required by N-498-1 would result in increased personnel radiation exposures, additional unscheduled reactor cavity fills and drains, and unnecessary challenges to the ability of the hot leg and cold leg injection flow path systems and components to perform their safety related function. These hardships would be incurred without a compensating increase in the level of quality and safety.

There are no new licensing based commitments in the communication. Should you have additional questions, please contact Obaid Bhatty at 254-897-5839.

Sincerely,

C. L. Terry

C. L. Terry

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