

July 28, 2003

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D.C. 20555-0001

Subject: Duke Energy Corporation (Duke)
McGuire Nuclear Station Units 1 and 2
Docket Nos. 50-369 and 50-370
Clarification of Request to Use Risk-Informed
Inservice Inspection Program (RI-ISI)

References: NRC Safety Evaluation Report on Relief Request
01-005 and 01-008, dated June 12, 2002 (TAC
NOS. MB2375, MB2376, MB2377 and MB2378)

By letter dated June 12, 2002, Duke Energy received notification that the RI-ISI program proposed in Relief Request RFR 01-005, "Application of Risk-Informed Methods to Piping ISI" was authorized for the third 10-year ISI interval on the basis the alternative provides an acceptable level of quality and safety.

Also by letter dated June 12, 2002, Duke Energy received notification that the alternative examination proposed in Relief Request RFR 01-008, "Volumetric Examination of Socket Welds" was authorized based on the alternative providing reasonable assurance of structural integrity. As discussed with the NRC Staff on July 24, 2003, the purpose of this letter is to clarify the use of the phrase "each refueling outage" as used in Relief Request 01-008.

The alternative examination proposed and authorized in Relief Request 01-008, Section V is as follows:

"When selected for examination by the RI-ISI program, socket welds in High Safety Significant segments will receive visual VT-2 examination each **refueling outage** during a

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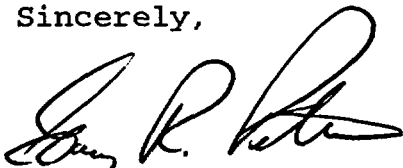
system pressure test or a pressure test specific to a component or element."

However, it may not be possible to perform a VT-2 during the refueling outage, if the particular system is not in service while the unit is offline and plant operating requirements prohibit placing the system in service. Similarly, it is not prudent to perform an additional test evolution during the outage when the system can be easily examined during the innage under normal system operation. For these reasons the phrase "each refueling outage" was intended to be implemented as "each refueling outage or at a frequency that is consistent with that time frame (i.e. 18 to 24 months) established by the refueling outage cycle". Therefore, it is Duke Energy's intention to be able to perform VT-2 examinations on any system on a frequency consistent with the refueling outage cycle.

This clarification permits proper consideration be given to plant operating requirements. Therefore, system manipulation is minimized by testing under normal system operation whenever possible, and the same frequency of examination for a specific element or segment is maintained. The alternative VT-2 examination frequency (once every cycle) would still exceed the volumetric frequency (once every 10 years) originally required as explained in Relief Request 01-008, Section VI, Basis for the Granting of Relief. Therefore, Duke Energy submits that this clarification is acceptable because it does not change the basis for approval of the alternative as received by letter dated June 12, 2002.

Please provide a response to acknowledge review of this letter, along with any comments or questions that the Staff might have. Questions on this matter should be directed to Norman T. Simms, McGuire Regulatory Compliance, at (704) 875-4685.

Sincerely,



Gary R. Peterson

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