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SUBJECT: Forwards addl info requested in 980716 NRC ltr re 980506
request to use alternative to requirements of ASME B&PV,
for exam requirements for post-tensioning sys of concrete
containments.

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September 16, 1998

U.S. Nuclear Regulatory Commission
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Washington, DC 20555

SUBJECT: Duke Energy Corporation

Oconee Nuclear Station - Units 1, 2, & 3
Docket Nos. 50-269, 50-270, and 50-287
TAC Nos. MA1766, MA1767, and MA1768

Request to use an Alternative to the ASME Boiler
and Pressure Vessel Code, Section XI in accordance
with 10 CFR 50.55a (a) (3) (i).
Duke Energy Corporation Serial Number 98-0002
(Formerly 98-ONS-002)

By letter dated May 6, 1998, Duke Energy Corporation requested the use of an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for Oconee Nuclear Station Units 1, 2, and 3. This request would allow the use of an alternative to the examination requirements for post-tensioning systems of concrete containments (Class CC components), as specified in the ASME Code, Section XI, 1992 Edition with the 1992 Addenda, Subsection IWL-2421 and IWL-2521, Table IWL-2521-1. This request for relief was originally designated as Duke Serial Number 98-ONS-0002. In a letter dated July 16, 1998, the NRC requested that additional information concerning this request be submitted to expedite the review process. Attached is additional information that we hope will assist with this evaluation.

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September 16, 1998
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If there are any questions or if further information is needed, please contact M. J. Ferlisi at (704) 382-3923.

Very truly yours,



W. R. McCollum, Jr.
Site Vice President

Attachment

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**Attachment 1
Sheet 1 of 2**

**DUKE ENERGY CORPORATION
Request for Alternative
Serial No. 98-0002 (Formerly 98-ONS-002)
Oconee Nuclear Station Units 1, 2, and 3**

The following additional information was requested in an NRC letter dated July 16, 1998:

In Request No. 98-ONS-0002, Duke Energy Corporation (the licensee) has proposed an alternative to the extent and frequency requirements of IWL-2420 and IWL-2520 for post-tensioning systems of Class CC components for its three prestressed concrete containments at the Oconee Nuclear Station, Units 1, 2, and 3. The Code does not explicitly address the circumstances encountered at the Oconee Nuclear Station where three similar units exist on one site.

Based on the review of the relief request, the staff has concluded that the following information and/or clarification is needed.

IWL-3222, Acceptance by Evaluation, states that items with examination results that do not meet the acceptance standards of IWL-3221 shall be evaluated as required by IWL-3300, Evaluation. IWL-3310 requires that the Owner prepare an Engineering Evaluation Report if the examination results do not meet the acceptance standards of IWL-3200. In addition to other report requirements, subparagraph (d) requires that the Owner state the "extent, nature, and frequency of additional examinations."

In context of the proposed alternative, provide information regarding the extent, nature, and frequency of additional examinations that will be performed if nonconforming conditions for unbonded post-tensioning systems are found at any of the three Oconee units.

Attachment 1
Sheet 2 of 2

Duke Energy Corporation Response:

The requested alternative to the requirements of the ASME Code, Section XI, Subsection IWL (Serial #98-0002) does not propose an alternative to the requirements of IWL-3300, EVALUATION. Duke Energy Corporation does NOT consider the requested alternative to supersede the acceptance standards of IWL-3100 or IWL-3200 or to provide exemption from performing an Engineering Evaluation when required by IWL-3310. Therefore, Duke Energy Corporation shall perform an Engineering Evaluation as required by IWL-3310, if examination results do not meet the acceptance standards of IWL-3100 or IWL-3200.

Because the extent and nature of nonconforming conditions which may be found during future examination of Oconee's Reactor Building unbonded post-tensioning systems are not yet known, it appears inappropriate to speculate on the extent, nature, and frequency of additional examinations that an Engineering Evaluation would require if such conditions are found. However, the extent, nature, and frequency of additional examinations shall be specified in the Engineering Evaluation as required by IWL-3310 and will be based on the significance and extent of the conditions which do not meet the acceptance standards of IWL-3100 and IWL-3200. Any Engineering Evaluation performed in accordance with IWL-3310 shall comply with requirements of Duke Energy's 10 CFR 50, Appendix B Quality Assurance Program, and the design of the containment shall be assured in accordance with Oconee UFSAR Sections 3.1.10 and 3.8.