

# CATEGORY 1

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SUBJECT: Informs that util intent to begin digital image capture of analog radiographic film in first quarter of 1999, per requirements of 1998 ASME Section V Code, Article 2, App VI. Digitization process will enhance storage of plant records.

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November 16, 1998

U. S. Nuclear Regulatory Commission  
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Subject: Duke Energy Corporation  
Oconee Nuclear Station - Units 1, 2, & 3  
Docket Nos. 50-269, 50-270, and 50-287  
McGuire Nuclear Station - Units 1 & 2  
Docket Nos. 50-369 and 50-370  
Catawba Nuclear Station - Units 1 & 2  
Docket Nos. 50-413 and 50-414  
Letter of Intent for Digitization of Radiographic  
Film to the Requirements of the 1998 ASME Section  
V Code

The 1989 Edition (no addenda) is the ASME Section XI Code of record for Duke Energy's Catawba, McGuire, and Oconee Nuclear Stations. ASME Section XI, IWA-6300, identifies Construction and Inservice Inspection radiographic films as lifetime quality assurance records. Duke Energy is required to maintain lifetime quality assurance records for the service lifetime of the component or system.

Duke Energy has always provided storage for analog radiographic film that meets or exceeds the required storage conditions for these records. In accordance with Duke Energy Nuclear Station Directive NSD-701, it is required to periodically review radiographic film in storage and verify condition. During a 1997 periodic review of film in storage, it was noted that some slight deterioration (film yellowing) was occurring. It was then decided that it was necessary to seek other means for permanent storage of analog radiographic film data.

The 1998 ASME Section V Code, Article 2, Appendix VI, has been published and addresses the requirements for digital capture of analog radiographic film images.

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On October 28, 1998, with the assistance of the Electric Power Research Institute, Duke Energy demonstrated the proficiency of the RadView® digitization process in meeting the requirements of the 1998 ASME Section V Code, Article 2, Appendix VI. Mr. Jerome J. Blake of the Nuclear Regulatory Commission and representatives of the Authorized Inspection Agency witnessed the performance demonstration.

Duke Energy has submitted Amendment 24 to the Quality Assurance Topical Report (Volume 17, UFSAR) for NRC approval. Amendment 24 addresses the use of digital optical storage for lifetime records. Approval of this amendment is expected at any time.

It is Duke Energy's intent to begin digital image capture of analog radiographic film in the first quarter of 1999. The digitization process will be performed to the requirements of the 1998 ASME Section V Code, Article 2, Appendix VI. The digitized information will be archived (in duplicate) to a write once read many (WORM) storage media. This method of archival storage coincides with the proposed amendment 24 to the Quality Assurance Topical Report (Volume 17, UFSAR). It is our intent to replace the analog radiographic film collection at the Catawba, McGuire and Oconee Nuclear Stations with the digitized information. The digitized information will be considered to be the permanent lifetime record.

The digitization process will enhance our storage of important plant records and provide us a mechanism for retrieval. It will enable us to continue to operate our stations safely now and into life extension.

If you have questions or need additional information, please contact Mr. Tim L. Tucker at (704) 373-3780.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. S. Tuckman", followed by a horizontal line.

M. S. Tuckman

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