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SUBJECT: Forwards suppl to 840913 request for relief from ASME Boiler
 & Pressure Vessel Code, Section XI through Winter 1980
 Addenda re inservice insp for second 10-yr interval.

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April 7, 1987

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

Subject: Oconee Nuclear Station, Unit 3
Docket No. 50-287
Purification Demineralizer
Penetration Room Ventilation System

Gentlemen:

Pursuant to 10CFR 50, §50.55a, please find attached a request for relief from the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (with Addenda through Winter 1980). The attached requests concern the inservice inspection at Oconee Unit 3 being performed during the second ten year interval.

This request is considered to supplement the request made by my letter of September 13, 1984. As such, no additional license fees are required.

Very truly yours,



Hal B. Tucker

PJN/154/jgm

Attachment

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Duke Power Company
Oconee Nuclear Station
Unit 3

I. Component for which Exemption is Requested:

- (a) Name and Number: Penetration Room Ventilation System
- (b) Function: Collects and processes potential Reactor Building penetration leakage to minimize environmental activity levels resulting from post-accident Reactor Building leaks.
- (c) ASME Section XI Code Class: 3
- (d) Valve Category: N/A

II. Reference Code Requirement that has been determined to be impractical:

ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition (with Addenda through Winter 1980) paragraph IWA-5211(c), which states that pressure retaining components within each system boundary shall be subject to system pressure tests under which conditions visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations, as referenced in Table IWA-5210-1, may be conducted in conjunction with one or more of the following system tests or operations:

- (c) a system inservice test conducted to perform visual examination VT-2 while the system is in service under operating pressure.

III. Basis for Requesting Relief:

The required inspection cannot be performed due to the fact that when the system is in service, it is not under pressure, but under a vacuum that extends to an open ended system.

IV. Alternate Examination:

Permanent relief is requested.

V. Implementation Schedule:

Permanent relief is requested.

Duke Power Company
Oconee Nuclear Station
Unit 3

I. Component for which Exemption is Requested:

- (a) Name and Number: Purification Demineralizer
- (b) Function: Demineralizes reactor coolant letdown
- (c) ASME Section XI Code Class: 3
- (d) Valve Category: N/A

II. Reference Code Requirement that has been determined to be impractical:

ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition (with Addenda through Winter 1980) paragraph IWA-5211(c), which states that pressure retaining components within each system boundary shall be subject to system pressure tests under which conditions visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations, as referenced in Table IWA-5210-1, may be conducted in conjunction with one or more of the following system tests or operations:

- (c) a system inservice test conducted to perform visual examination VT-2 while the system is in service under operating pressure.

III. Basis for Requesting Relief:

Piping from the demineralizer to the point where the piping penetrates the floor cannot be inspected due to the fact that radiation dose at the demineralizer is in excess of 250R.

IV. Alternate Examination:

Piping will be hydrostatically tested during the 10 year Inservice Inspection by performing a pressure drop test.

V. Implementation Schedule:

Hydrostatic testing will be performed during the 10 year Inservice Inspection.