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SUBJECT: Requests use of alternative to ASME boiler & PV code Section XI for plants. Informs that Duke Power requests approval to use provisions of Code Case N-416-1.

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DUKE POWER

February 22, 1995

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

SUBJECT: Duke Power Company

McGuire Nuclear Station, Units 1 & 2
Docket Nos. 50-369, 50-370

Catawba Nuclear Station, Units 1 & 2
Docket Nos. 50-413, 50-414

Oconee Nuclear Station, Units 1, 2 & 3
Docket Nos. 50-269, 50-270, 50-287

Request to Use an Alternative to ASME Code Section XI
Duke Power Request for Relief 95-GO-001

Dear Sir:

Pursuant to 10 CFR 50.55a (a) (3) (ii), Duke Power Company requests the use of an alternative to the ASME Boiler and Pressure Vessel Code Section XI for McGuire Units 1 and 2; Catawba Units 1 and 2 and Oconee Units 1, 2 and 3. Specifically, Duke Power requests approval to use the provisions of Code Case N-416-1, "Alternative Pressure Test Requirement For Welded Repairs Or Installation Of Replacement Items By Welding, Class 1, 2, and 3, Section XI, Division 1" dated February 15, 1994.

In the past, at each of our Nuclear Stations, we have found it necessary to defer hydrostatic tests or ask relief from ASME Section XI hydrostatic tests following repair or replacement activities. This was due to various reasons of impracticality such as hardship on the plant due to extended system down time, difficulty in locating and installing hydrostatic pumps and gages necessary to pressurize the system, or special efforts such as dismantling valves or use of freeze plugs in order to isolate the test boundary. Many times, these problems are discovered during the test or prior to performing the test. As a consequence, these situations have necessitated prompt communications with the NRC to avoid exceeding the limiting condition for operation or delaying startup.

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A hydrostatic test has never detected any leaks or flaws resulting from welded repairs or welded replacements at the Duke nuclear stations. Thus it is felt the elimination of this hydrostatic testing will not compromise the safety of our operating units.

Use of hydrostatic test deferrals, which are presently allowed in the current Code Case N-416 for Class 2 components, is not satisfactory because relief from the burden of conducting the test is not achieved. Also, Code Case N-416 does not apply to Class 1 and 3 components. Code Case N-416-1 allows a system leakage test to be performed in lieu of a hydrostatic pressure test when Section XI code repairs are made, provided that NDE is performed in accordance with the methods and acceptance criteria of the applicable Subsection of the 1992 Edition of Section III and that prior to or immediately upon return to service, a visual examination (VT-2) shall be performed in conjunction with a system leakage test, using the 1992 Edition of Section XI, in accordance with paragraph IWA-5000, at nominal operating pressure and temperature. Code Case N-416-1 applies to Class 1, 2 and 3 components and provides flexibility which should considerably reduce the number of relief requests associated with post welded repair/replacement hydrostatic testing while, as determined by the ASME Code, maintaining an acceptable level of safety and quality.

As a further requirement, when N-416-1 is applied, additional surface examinations will be performed on the root (pass) layer of butt and socket welds on the pressure retaining boundary of Class 3 components.

Proposed Alternative Examination:

Duke Power proposes to apply Code Case N-416-1 as alternative pressure test rules for welded repairs or installation of replacement items by welding in Class 1, 2, and 3 piping at McGuire Units 1 and 2, Catawba Units 1 and 2, and Oconee Units 1, 2 and 3.

Catawba Unit 1 is presently in the End of Cycle 8 outage. Therefore, it is requested that a reply granting approval to use Code Case N-416-1, at least for Catawba Unit 1, be received by March 9, 1995. The feasibility of receiving approval in this time frame was discussed with Mr. T. K. McLellan, NRR in an informal telephone conference call held during the week of February 6, 1995, and is based on the fact that Code Case N-416-1 has been previously reviewed and approved for use by other utilities.

If you have any questions concerning this request, please call J. S. Warren at (704) 382-4986. Also, it is requested that the approval of this request be forwarded via FAX number (704) 382-4545 to the attention of J. S. Warren.

U. S. Nuclear Regulatory Commission
February 22, 1995
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Very truly yours,

M. S. Tuckman

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MST/JSW

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