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SUBJECT: Discusses second ten yr inservice insp interval request for relief 94-go-002 suppl info.

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DUKE POWER

October 20, 1994

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

Subject: Duke Power Company
Oconee Nuclear Station
Docket No. 50-270
Second Ten Year Inservice Inspection Interval
Request for Relief Nos. 94-GO-002
Supplementary Information

On June 22, 1994 Duke Power Company submitted Relief Request 94-GO-002 to request generic approval to implement ASME Code Case N-522 with the technical justification that the alternate examination methodology of Code Case N-522 permits the use of 10 CFR 50 Appendix J tests (to verify containment integrity) in lieu of interval hydrostatic pressure tests for designated piping and isolation valves.

As stated in the June 22, 1994 letter, Duke had proposed to "incorporate (this code case) into the nuclear sites ISI programs and procedures on an immediate basis, with the first actual implementation to be at Oconee Unit 2 during the End-of Cycle 14 outage in October 1994."

Duke now understands that this code case will not be approved in time to be implemented during the U2EOC14 outage as previously planned. Since the refueling outage schedule was implemented under the assumption that Code Case N-522 would be approved prior to the U2EOC14 outage, it is Duke's position that to schedule, proceduralize, and perform 14 tests to which Code Case N-522 would be applicable would incur considerable hardship and would result in a certain delay of the U2EOC14 Outage completion date (approximately 14 Nov 1994) by at least 2 days. In addition to this, the U2EOC14 Outage is the last scheduled outage in the Oconee Unit 2 Second ISI Inspection Interval, which is scheduled to end on December 16, 1994. These 14 tests are:

<u>PEN#</u>	<u>DRAWING</u>	<u>OD</u>	<u>DESIGN</u>	<u>SYSTEM NAME</u>
46	OFD-106E-2.1	6"	110 PSIG	FILTERED WATER
55	OFD-106E-2.1	4"	100 PSIG	DEMINERALIZED WATER
18	OFD-107A-2.1	2"	55 PSIG	GASEOUS WASTE DISPOSAL
5	OFD-107B-2.1	2"	59 PSIG	LIQUID WASTE DISPOSAL
5	OFD-110A-2.4	1"	2500 PSIG	POST ACCIDENT LIQUID SAMPLING
19	OFD-116A-2.1	48"	75 PSIG	REACTOR BUILDING PURGE
20	OFD-116A-2.1	48"	75 PSIG	REACTOR BUILDING PURGE
60	OFD-116C-2.1	2"	60 PSIG	REACTOR BUILDING HYDROGEN PURGE

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61	OFD-116C-2.1	2"	60 PSIG REACTOR BUILDING HYDROGEN PURGE
39	OFD-127B-2.1	1"	700 PSIG NITROGEN PURGE
53	OFD-127B-2.1	1"	700 PSIG NITROGEN PURGE
53	OFD-127B-2.1	2"	150 PSIG NITROGEN PURGE
41	OFD-137B-1.2	3"	110 PSIG INSTRUMENT AIR
3	OFD-144A-2.2	6"	150 PSIG COMPONENT COOLING

All of these items are ASME Class 2 (ISI Class B).

Duke proposes to perform testing in accordance with Code Case N-522 for the U2EOC14 outage in lieu of the ASME testing specified per IWC-5222 and to delay the testing per ASME XI, IWC-5222 until the next Unit 2 Refueling Outage (Unit 2 End-of Cycle 15 outage) if Code Case N-522 is either 1) Not approved yet or 2) Denied. If Code Case N-522 is approved generically by the NRC prior to the U2EOC15 Refueling Outage, then the 14 tests specified above would be dropped as per the 22 June 1994 relief request. It is Duke's position that this proposed delay would not result in any decrease in the level of quality or safety to the public.

Duke requests a response to this docket prior to 01 November 1994 since the U2EOC14 Refueling Outage is scheduled to be completed on approximately 14 November 1994.

If there are any questions or further information is needed you may contact D. A. Nix at (803) 885-3634.

Very truly yours,


J. W. Hampton
Site Vice President

U. S. Nuclear Regulatory Commission
Page 3

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