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STOLZ,J.F.	Operating Reactors Branch 4

SUBJECT: Forwards supplimental request for relief from inservice insp requirements of 1980 Edition of ASME Boiler & Vessel code Section XI.Requests concerns inservice insps during second 10-yr interval.

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November 12, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

Pursuant to 10 CFR 50, §50.55a, please find attached a request for relief from the Inservice Inspection requirements of Section XI of the 1980 Edition of the ASME Boiler and Pressure Vessel Code (with addenda through winter 1980). This request concerns Inservice Inspections at Oconee Units 1, 2 and 3 being performed during the second ten year interval.

This request is considered a supplement to the request made by my letter of September 13, 1984, as supplemented by my letters dated November 16, 1984 and December 11, 1984. As such, no additional fees are required.

Very truly yours,

H.B. Tucker / PBC

Hal B. Tucker

PFG:slb

Attachment

cc: Dr. J. Nelson Grace, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, NW, Suite 2900
Atlanta, Georgia 30323

Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

Ms. Helen Nicolaras
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Washington, D. C. 20555

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DUKE POWER COMPANY
OCONEE NUCLEAR STATION UNITS 1, 2 & 3

Request For Relief From
ASME Code Section XI
(With Addenda Through Winter 1980)
Inservice Inspection Requirement

I. Component for which exemption is requested:

a. Name and Number:

Piping from valves BS-14 and BS-19 to containment spray nozzles. Piping from reactor building emergency sump to valves LP-19 and LP-20. (Typical all three units.)

b. Function:

Containment Heat Removal

c. ASME Section III Code Class:

Class 2

d. Valve Category:

N/A

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

Paragraph IWC-1220(b), which states that components may be exempted from examination if the design temperature is 200°F or less, and the design pressure is 275 psig or less.

Table IWC-2500-1, examination category C-F requires surface examination of 25% of total number of circumferential butt welds exceeding 4" NPS at structural discontinuities.

III. Basis for Requesting Relief:

1. The Design conditions listed for the containment spray headers from valves BS-14 and BS-19 to the spray nozzles are 200 psig at 300°F. As noted, the design pressure is within the limit for exemption under IWC-1220(b); however, the design temperature is not. Although the design temperature of the piping is 300°F, analysis indicates that the maximum temperature of the fluid to be contained within the piping following the Design Basis accident is 250°F and that the fluid temperature will drop below 200°F within 25 hours after the Design Basis accident. In sum, the Reactor Building Spray lines are not normally subjected to the design conditions noted and would only be operated in excess of 200°F for approximately 25 hours following a Design Basis accident.

   Further, the piping of the Reactor Building Spray System from valves BS-14 and BS-19, which runs vertically, and adjacent to the Reactor Building wall to the spray nozzles at the building dome, makes the required examination difficult and dangerous to perform.

2. The design conditions for the Reactor Building emergency sump suction lines are building pressure at 300°F. As noted, the design pressure is within the limits for exemption under IWC-1220(b); however, the design temperature is not. Although, the design temperature of the piping is 300°F, analysis indicates that the maximum temperature of the fluid to be contained within the piping following the Design Basis accident (DBA) is 250°F and that the fluid temperature will drop below 200°F within 25 hours after the DBA. In sum, the Reactor Building Sump lines are not normally subjected to the design conditions noted and would only be operated in excess of 200°F for approximately 25 hours following a DBA. Further, the Reactor Building emergency sump lines are embedded in concrete and are inaccessible for the required examination.

   Therefore based on the above discussions, Duke requests that the piping from valves BS-14 and BS-19 to containment spray nozzles and the piping from Reactor Building emergency sump to valves LP-19 and LP-20 be considered exempt from the requirements of Section XI, Paragraph IWC-2500-1.

IV. Alternative Examination:

No surface examination will be performed on this piping.

V. Implementation Schedule:

This request will apply to the second ten-year interval for Oconee Units 1, 2 and 3.