

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8704220011 DDC DATE: 87/04/13 NOTARIZED: NO DOCKET #
 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
 AUTH. NAME AUTHOR AFFILIATION
 TUCKER, H. B. Duke Power Co.
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Forwards requests for relief from requirements of ASME
 Boiler & Pressure Vessel Code, Section XI re testing specific
 valves in reactor bldg normal sump sample portion of post-
 accident liquid sampling sys.

DISTRIBUTION CODE: A047D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 3
 TITLE: OR Submittal: Inservice Inspection/Testing

NOTES: AEOD/Ornstein: 1cy. 05000269
 AEOD/Ornstein: 1cy. 05000270
 AEOD/Ornstein: 1cy. 05000287

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD2-3 LA	1 0	PD2-3 PD	5 5
PASTIS, H	1 1		

INTERNAL: AEOD/DOA	1 1	AEOD/DSP/TPAB	1 1
ARM/A&F/LFMB	1 0	NRR/DEST/ADE	1 0
NRR/DEST/MEB	1 1	NRR/PMS/PMSB	1 1
OGC/HDS2	1 0	<u>REC FILE</u> 01	1 1
EXTERNAL: LPDR	1 1	NRC PDR	1 1
NSIC	1 1		

NOTES: 1 1

REC'D Without Check

DUKE POWER COMPANY

P.O. BOX 33189
CHARLOTTE, N.C. 28242

HAL B. TUCKER
VICE PRESIDENT
NUCLEAR PRODUCTION

TELEPHONE
(704) 373-4531

April 13, 1987

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

Subject: Oconee Nuclear Station, Units 1, 2, & 3
Docket No. 50-269, -270, -287
PALS RBNS ISI Relief Request

Gentlemen:

Pursuant to 10CFR 50, §50.55a, please find attached requests for relief from the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (with Addenda through Winter 1980). These requests are being submitted due to the impracticality of testing specific valves in the Reactor Building Normal Sump sample portion of the Post Accident Liquid Sampling System.

These requests for relief require payment of a fee for approval as described in 10CFR 70, §170.12. Accordingly, please find attached a check in the amount of \$150.00 as set forth in §170.21.

Very truly yours,



Hal B. Tucker

PJN/157/jgm

Attachment

xc: Dr. J. Nelson Grace
Regional Administrator
U.S. Nuclear Regulatory
Commission - Region II
101 Marietta St. NW
Suite 2900 - Atlanta, GA 30323

Mr. Heyward Shealy, Chief
Bureau of Radiological Health
S.C. Dept. of Health and
Environmental Control
2600 Bull Street
Columbia, S.C. 29201

Ms. Helen Pastis
Office of Nuclear
Reactor Regulation
U.S. Nuc. Regulatory Commission
Washington, D.C. 20555

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

8704220011 870413
PDR ADDCK 05000269
P PDR

A047
||
REC'D WITHOUT
CHECK

Duke Power Company
Oconee Nuclear Station
Units 1, 2, and 3

I. Component for which Exemption is Requested:

- (a) Name and Number: Reactor Building Normal Sump(RBNS) sample line valves (1),(2),(3)LWD-1026; (1),(2),(3)LWD-1028 and (1),(2),(3)DW-280.
- (b) Function: Allows sample flow from the RBNS to the PALS panel.
- (c) Valve Category: B
- (d) Valve Type: LWD-1026 (air operated), LWD-1028 (electrically motor operated), and DW-280 (solenoid operated).

II. Reference Code Requirement Determined to be Impractical:

IWV-3410 Valve Exercising Test

III. Basis for Requesting Relief:

These valves are in the line between the normal sump and the Post Accident Liquid Sampling System (PALS). Due to the amount of debris in the normal sump, this line is clogged every time sampling is attempted. Although stroking these valves can be demonstrated by valve stem movement, the clogged line does not allow flow to pass. If flow cannot be passed through this sample point during testing, it is doubtful that a sample could be obtained by this flow path during an accident situation. Therefore, stroke testing of these valves is inconsequential.

In the event of an accident, reactor coolant samples are available through the PALS from the Reactor Coolant System (RCS) hot leg. In addition, core damage can be estimated based on containment air samples. Rough estimates may be made by use of area monitors in the containment building, and hydrogen concentration in containment atmosphere. Other liquid sample locations are available, but with increased risk of high personnel dose.

IV. Alternate Test:

By letter dated January 2, 1987 Duke informed the NRC that Duke intends to replace the current PALS system with a new design. In concept, the new design reduces the complexity of the system, provides better dilution control, and improves the instrumentation on the control panel which should improve sample accuracy and reproducibility of results.

As such, no alternative examination for valves LWD-1026, LWD-1028, and DW-280 will be proposed until replacement of the PALS is complete. The valves used in the new PALS will be identified in the Inservice Inspection Program and stroke tested per ASME Code requirements.

V. Implementation Schedule:

The new PALS will be installed on Unit 3 by June 1, 1988. Procedures will be written, and functional testing and training will be performed on the new system by December 1, 1988. The schedule for implementation on the remaining units will be published by January 1, 1989.

Duke Power Company
Oconee Nuclear Station
Units 1, 2, and 3

I. Component for which Exemption is Requested:

- (a) Name and Number: Reactor Building Normal Sump(RBNS) sample line valves (1),(2),(3)LWD-1027.
- (b) Function: Allows sample flow from the RBNS to the PALS panel.
- (c) Valve Category: C
- (d) Valve Type: Check Valves

II. Reference Code Requirement Determined to be Impractical:

IWV-3420 Valve Leak Rate Test

III. Basis for Requesting Relief:

These valves are in the line between the normal sump and the Post Accident Liquid Sampling System (PALS). Due to the amount of debris in the normal sump, this line is clogged every time sampling is attempted. The test for verifying operability of these valves for the Inservice Inspection Program can only be demonstrated by flow in the line, the clog does not allow flow to pass. If flow cannot be passed through this sample point during testing, it is doubtful that a sample could be obtained by this flow path during an accident situation. Therefore, testing of these valves is inconsequential.

In the event of an accident, reactor coolant samples are available through the PALS from the Reactor Coolant System (RCS) hot leg. In addition, core damage can be estimated based on containment air samples. Rough estimates may be made by use of area monitors in the containment building, and hydrogen concentration in containment atmosphere. Other liquid sample locations are available, but with increased risk of high personnel dose.

IV. Alternate Test:

By letter dated January 2, 1987 Duke informed the NRC that Duke intends to replace the current PALS system with a new design. In concept, the new design reduces the complexity of the system, provides better dilution control, and improves the instrumentation on the control panel which should improve sample accuracy and reproducibility of results.

As such, no alternative examination for valves LWD-1027 will be proposed until replacement of the PALS is complete. The valves used in the new PALS will be identified in the Inservice Inspection Program and stroke tested per ASME Code requirements.

V. Implementation Schedule:

The new PALS will be installed on Unit 3 by June 1, 1988. Procedures will be written, and functional testing and training will be performed on the new system by December 1, 1988. The schedule for implementation on the remaining units will be published by January 1, 1989.