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 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

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SUBJECT: Forwards Request for Relief 89-09 from requirements of
 Section XI of ASME Boiler & Pressure Vessel code.

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December 5, 1989

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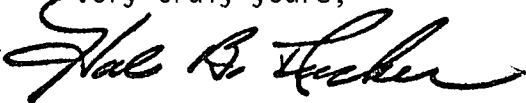
Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Second Ten Year Interval
Request for Relief No. 89-09

Gentlemen:

Pursuant to 10CFR 50, 50.55a, please find attached request for relief number 89-09 from the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (with Addenda through Winter 1980). This request is being submitted due to the impracticality of pressure testing specific welds as required by the Code following repair. The attached request concerns the inservice inspection at Oconee Unit 3 being performed during the second ten year interval. Unit 3 Cycle 12 initial criticality is currently scheduled for December 17, 1989. Note relief request number 89-05 regarding 2AS-39 has been previously reviewed and approved by NRC letter dated October 10, 1989.

Future need for relief from Code requirements for valves 1 MS-91, 2 MS-91, 1 AS-39 and 2 AS-39 cannot be predicted. As such my staff is seeking NRC staff guidance on generic applicability of relief requests.

Very truly yours,



Hal B. Tucker

PJN/73/td

Attachment

8912120014 891205
PDR ADOCK 05000269
Q PDC

AOA7
11

Document Control Desk
December 5, 1989
Page 2

cc: W/O Diagrams
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Duke Power Company
Oconee Nuclear Station
Second Ten Year Interval
Request for Relief Nos. 89-09

I. Component for which relief is requested:

- (a) Name and Number Auxiliary Steam (AS) System welds for installing valve AS-39 and Main Steam (MS) system welds for installing valve MS-91 (see attached flow diagram).
- (b) Function: AS-39 and MS-91 prevent backflow between the Main Steam and Auxiliary Steam Systems.
- (c) ISI Class/Duke Class: ISI Class C/Duke Class F
- (d) IWV-2200 Valve Category: C
- (e) Materials: 6-inch schedule 40 carbon steel

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-4400(a), which states that after repairs by welding on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000.

III. Basis for requesting relief:

Hydrostatic testing would require filling of Auxiliary Steam System lines with water. Based on past experience the Auxiliary Steam header cannot be drained properly after being filled with water due to the lack of adequate low point drains in the system. Water left in the auxiliary steam header following the required hydrotest could potentially damage the emergency feedwater pump turbine.

IV. Alternate examination:

Welds will be 100% radiographed and a VT-2 inspection will be performed at operating temperature and pressure. In addition, the welds will be hydrostatically tested during the second ten year interval inservice inspection hydro of the main steam lines.

V. Evaluation of acceptability of proposed alternate testing with respect to the level of quality and safety as well as public health and safety:

The specified method of hydrostatic testing verifies that there are no leaks at 1.25 times the design pressure. The alternate examination of 100% radiograph of welds assures that no significant flaws are evident in the welds. The VT-2 inspection indicates that no leaks are detectable when the system is at operating temperature and pressure. The alternate tests provide an equivalent method to indicate a leak at the higher stress level which is normally verified by the specified method of hydrostatic testing. As such, the proposed alternate examinations provide an acceptable level of quality and safety and will not endanger the health and safety of the public.

VI. Implementation Schedule:

For Unit 3, the 100% radiograph will be performed during the Unit 3 End of Cycle 11 refueling outage, the VT-2 inspection will be performed during startup following the Unit 3 End of Cycle 11 refueling outage. For Units 1 and 2, replacement of valves MS-91 and AS-39 is not currently scheduled. Hydrostatic testing will be performed during the second ten year interval inservice inspection hydro of the main steam lines.

TIGGS

C. ALEXANDER (W.G.D.)

R.L.M.

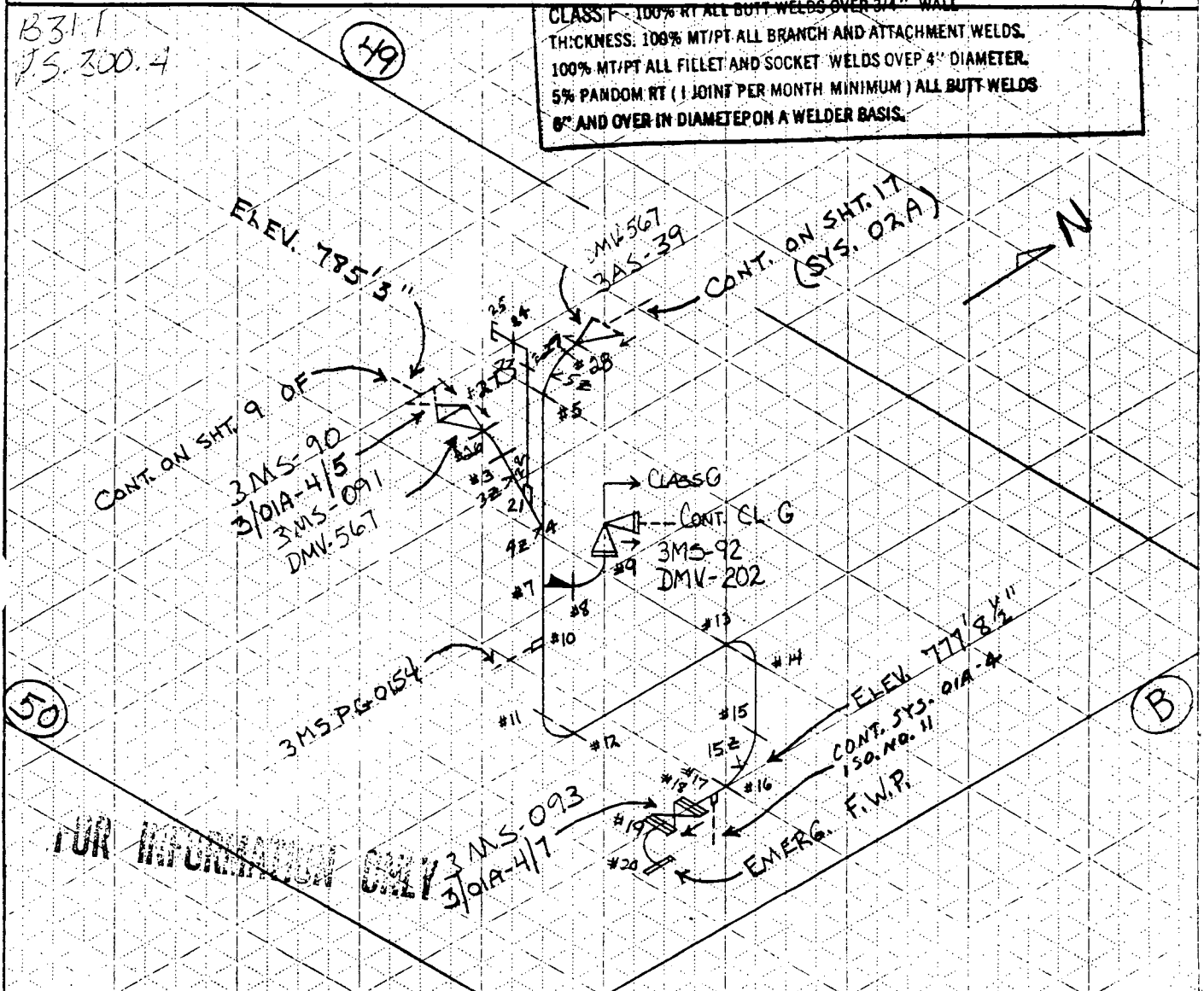
DUKE POWER COMPANY
CONSTRUCTION DEPARTMENT

MAINSTEAM "3A" + "3B"

ISOMETRIC SKETCH To EMERG. F.W.P.

PROJECT OCONEE SYSTEM OIA-4 SUB SYSTEMS (2) UNIT 3T.B. ISO. NO. * 10 REV. NO. 11CLASS F MATERIAL CFE WELDING PROCEDURE P-3/P-20 LAST WELD NO. 29 DATE 10/19/89

CLASS F - 100% RT ALL BUTT WELDS OVER 3/4" WALL
 THICKNESS: 100% MT/PT ALL BRANCH AND ATTACHMENT WELDS.
 100% MT/PT ALL FILLET AND SOCKET WELDS OVER 4" DIAMETER.
 5% PANDOM RT (1 JOINT PER MONTH MINIMUM) ALL BUTT WELDS
 6" AND OVER IN DIAMETER ON A WELDER BASIS.



REF. DWG. NOS.	SIZE x WALL THICKNESS		WELD NUMBERS	NDT CODE	ISO. REV. NO.	CHANGES		ISO. REV. NO.	CHANGES	
	DWG.	REV.				±	WELD NOS.		±	WELD NOS.
2400 A	16				10		ADD CONTINUATION	11		
2400 H	8		6" φ X. 280"		9.1		+ 15 Z			
			3" φ X. 216"		0.1		+ 21-25			
P.O. 122 A-3					5.1		ADD CONT.			
P.O. 123 A-3			2" φ X. 154"		6.1		P-23B			
OED-122 A-3.4					7.1		+ 5 Z			
NSM-32245			3/4" φ X. 113"		8.1		+ 4 Z			
WR# 97912C			2" φ X. 109"		9.1		+ 3 Z			
			ATTACH		10.1		PHIT TEMP. PIPE			
			15 Z, 5 Z, 4 Z, 3 Z		11.1		R/WP Revise Configuration			

*ALL WELD NUMBERS SHOWN ABOVE ARE PRECEDED BY THE ISO. NO.

W.G.D.

NOT EXCEPTION - 10, 17, 18 - 100% RT
 19, 20, 21

PROCEDURE		FORM MWP25		REVISION 2					
DUKE POWER COMPANY OCONEE NUCLEAR STATION									
PIPING ISOMETRIC REVISION SHEET									
SKETCH <i>See Iso</i>			SYSTEM NO. <u>01A-4</u> UNIT <u>3</u>						
			ISO. NO. <u>10</u>						
			REV. NO. <u>11</u>						
			ORIGINATOR <u>J. Phillips</u>						
			DATE <u>October 14, 1989</u>						
			STATION MOD. REQUIRED: YES <u> </u> NO <u>X</u> NO. <u> </u>						
			WORK REQUEST REQUIRED: <u>052795H</u>						
			YES <u>X</u> NO <u> </u> NO. <u>052797H</u>						
REASON FOR CHANGE: <u>Replace 3 MS-91 + 3 AS-39 with 2 DMV-567</u> <u>Delete welds 1, 2 + 6. Add welds 26, 27, 28 + 29</u>									
ADDED WELDS									
WELD NO.	PIPE SIZE	WALL THICK.	CLASS	MAT'L	TYPE WELD	WELD. PROC.	PERFORMANCE TEST NO.	NDT CODE	HEAT TREAT PROCEDURE
26	6"	.280	F	CFE	OB	L-350	L-185, L-154	VT	1AW FWDs
27	6"	.280	E	CFE	OB	L-350	L-185, L-154	VT	↓
28	6"	.280	E	CFE	OB	L-350	L-185, L-154	VT	↓
29	6"	.280	F	CFE	OB	L-350	L-185, L-154	VT	↓
OMITTED WELDS									
WELD NO.	PIPE SIZE & WALL		WELD NO.	PIPE SIZE & WALL					
1	6" x .280								
2	6" x .280								
6	6" x .280								
REV. MADE BY DRAFTSMAN: <u>Jolepa Chan</u>						DATE: <u>October 14, 1989</u>			
REV. APPROVED BY S.M. ENG.: <u>John G. [unclear]</u>						DATE: <u>October 16, 1989</u>			
REV. APPROVED BY QA: <u>A. J. [unclear]</u>						DATE: <u>10-16-89</u>			
REV. ACCEPTED BY ANI: <u>R. F. [unclear]</u>						DATE: <u>10-16-89</u>			

*ALL WELD NUMBERS SHOWN ABOVE ARE PRECEDED BY THE ISO. NO. W.G.D.

[illegible]