

Duke Power Company  
McGuire Nuclear Generation Department  
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Huntersville, NC 28078-8985

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**DUKE POWER**

December 16, 1994

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

Subject: McGuire Nuclear Station  
Unit 2, Docket 50-370  
Inservice Inspection Program  
ASME Code Case N-416-1

Dear Sirs;

ASME 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 was approved by the ASME Code on February 15, 1994. However, this Code Case has not yet been endorsed in Regulatory Guide 1.147, Inservice Inspection Code Case Acceptability ASME Section XI Division 1. Therefore, pursuant to 10CFR50.55(a)(3), it is requested that Code Case N416-1 with certain stipulations be approved in lieu of individually submitted Requests for Relief for McGuire Unit 2 End of Cycle 9 (2EOC9) through Unit 2 End of Cycle 10 (2EOC10).

In past situations we have found it necessary to ask for relief from post ASME Section XI hydrostatic test following repair or replacement activities due to various reasons of impracticality in testing. These situations are typically unexpected. As a consequence, some of these situations have necessitated prompt communications with the NRC to avoid exceeding limiting conditions of operation or more frequently avoiding startup delays.

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Use of hydrostatic test deferrals, which are presently allowed in the current Code Case N-416 for Class 2 components, are not a satisfactory solution because the test must eventually be performed, and it is the performance of the test itself that is considered burdensome.

Code Case N-416-1 provides increased testing flexibility to the Licensee, which should considerably reduce, if not eliminate, relief request requirements associated with post welded repair/replacement hydrostatic testing. This is accomplished while maintaining an acceptable level of safety and quality as determined by the ASME Code.

McGuire Unit 2 request to application of Code Case N-416-1 with the following stipulations:

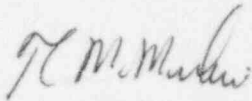
- 1) In lieu of the 1992 Edition of Section III as per paragraph (a) of N-416-1, McGuire Unit 2 will use the 1971 Edition, Winter and Summer Addenda of Section III (the Construction Code).
- 2) Paragraph (b) of N-416-1 requires the use of the 1992 Edition of Section XI, in accordance with paragraph IWA-5000. McGuire Unit 2 will use the 1992 Edition of Section XI for application of IWA-5000, IWB-5000, IWC-5000 and IWD-5000. However, when these Articles specify the use of 2000 and 3000 series Articles, the appropriate paragraphs in the 2000 and 3000 series Articles of 1989 Edition of Section XI will be used.
- 3) When using the 1992 Edition of Section XI, only those paragraphs to perform system pressure testing due to Code repairs or replacements will apply.
- 4) As an additional 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.

Unit 2 is currently in End of Cycle (EOC) 9 outage. It is requested the McGuire be granted interim approval to use Code Case N-416-1 from date of approval to the end of 2EOC10.

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I request that the approval of this request be forwarded via  
FAX number (704) 875-4165 to the attention of J.E. Snyder  
Manager, Regulatory Compliance.

Very truly yours,

A handwritten signature in cursive script, appearing to read "T. C. McMeekin".

T. C. McMeekin

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xc: Mr. S.D. Ebnetter  
Administrator, Region II  
U.S. Nuclear Regulatory Commission  
101 Marietta St., NW, Suite 2900  
Atlanta, Ga. 30323

Mr. Victor Nerses  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Washington, DC 20555

Mr. George Maxwell  
Senior NRC Resident Inspector, McGuire  
McGuire Nuclear Station

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bxc: with attachments

J.E. Snyder  
J.M. Washam  
K.L. Crane  
R.D. Klein (MGO1MM)  
R. Branch (MGO1MM)  
C.B. Cheezem, Jr. (MGO2ND)  
W.G. Goodman (EC07J)  
G.J. Underwood (EC05P)  
G.J. Holbrooks (MGO1MM)  
H.H. Wallace (MG01CP)  
J.O. Barbour (EC07J)  
G.A. Copp, III (EC050)  
File: Relief Request  
ELL (EC050)