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**DUKE POWER**

October 2, 1991

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

Subject: McGuire Nuclear Station, Unit 1  
Docket No. 50-369  
ASME Code Section XI Hydrostatic Testing Requirements  
Relief Request No. 90-02

References: 1) Letter from M.S. Tuckman to NRC, same subject, dated  
November 19, 1990  
2) Letter from M.S. Tuckman to NRC, same subject, dated  
July 31, 1991

Gentlemen:

The purpose of this letter is to clarify our earlier submittals of  
Relief Request 90-02 as made in References 1 and 2 above as discussed in  
a conference call held between D.B. Matthews and T.A. Reed of the NRC  
and R.L. Gill of Duke Power Company on September 30, 1991.

By copy of this letter, Duke Power Company is resubmitting Relief  
Request 90-02 and References 1 and 2 are superceded in their entirety.

Should there be any questions regarding this matter, contact L.J. Rudy  
at (704) 373-3413.

*M.S. Tuckman*

M.S. Tuckman

LJR/s

Attachment

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xc (W/Attachment):

S.D. Ebnetter

Regional Administrator, Region II

T.A. Reed

ONRR

P.K. VanDoorn

Senior Resident Inspector

Duke Power Company  
McGuire Nuclear Station Unit 1  
Request for Relief from ASME Code Section XI Requirements  
Relief Request No. 90-02

I. Component for which Relief is Requested:

The systems and components for which relief is requested are those portions of items identified in the McGuire inservice inspection program that have not been hydrostatically tested as required. Please reference the McGuire Inservice Program and post-outage inservice reports for McGuire Unit 1.

II. ASME Code Section XI Requirement that has been Determined to be Impractical:

ASME Boiler and Pressure Vessel Section XI, B and PV, and IWA 2400, Section C.

III. Alternate Examination Proposed:

No alternate examinations are being proposed. The required examinations will be performed. The only change will be the time the examinations will be performed.

IV. Basis for Requesting Relief:

When the original inservice inspection plan for McGuire Nuclear Station was developed in the early 1980 time frame, it was assumed that there would be ten refueling outages during the initial ten-year interval for Unit 1. Accordingly, the required hydrostatic testing of systems and components was scheduled in such a manner to assure that they were all completed by the tenth refueling outage.

Midway through this ten-year interval, the cycle lengths for operation of Unit 1 were increased from twelve to eighteen months. As a result of this change, the actual number of refueling outages that would occur during the ten-year interval was reduced by three refueling outages. As such, there would only be seven refueling outages during the ten-year inservice inspection interval to complete all of the required hydrostatic tests instead of the original planned ten refueling outages.

Currently, McGuire Unit 1 has entered its end-of-cycle 7 refueling outage. Furthermore, the end-of-cycle 8 refueling outage for Unit 1 is currently scheduled to begin December 11, 1992, which is outside the additional twelve-month extension allowed by the ASME Code. That is, the current ten-year inservice inspection interval for Unit 1 ends on December 1, 1991. As allowed by the ASME Code, the ten-year interval can be extended an additional twelve months (i.e., can be extended to December 1, 1992). As currently scheduled, the end-of-cycle 8 refueling outage would begin after the extended ten-year inservice inspection interval expired.

Based on the above discussion, all of the remaining hydrostatic tests would need to be completed during the end-of-cycle 7 refueling outage for Unit 1. The impact associated with this situation is that McGuire Unit 1 would be required to extend the end-of-cycle 7 refueling outage in order to complete all of the remaining required hydrostatic tests. In addition, there is an administrative burden associated with the rescheduling of all the remaining hydrostatic tests during the end-of-cycle 7 refueling outage.

Current plans for McGuire Unit 1 call for the remainder of Class C hydrostatic tests to be completed during the end-of-cycle 7 refueling outage. In addition, approximately 50% of Class B hydrostatic tests are complete (most of these were on piping located inside containment). During the end-of-cycle 8 refueling outage, the remainder of the Class B hydrostatic tests will be completed.

V. Why the Alternate Proposed Testing will Provide an Acceptable Level of Quality and Safety:

At McGuire to date, all inservice and functional inspections have revealed no evidence of failed welds in pressure retaining piping systems.

The McGuire Unit 1 inservice inspection interval began on December 1, 1981. Duke Power Company's evaluation of the results of the inservice program thus far indicate that extending the McGuire Unit 1 inservice inspection interval for the purpose of completing these hydrostatic tests would not endanger the quality of operations nor affect the health and safety of the public. Therefore, Duke Power Company believes that the burden of extending a normal refueling outage in order to complete the required hydrostatic testing outweighs the benefit of imposing the requirement during the normally scheduled inservice interval.

VI. Implementation:

Duke Power Company's request is to add four weeks to the ten-year inservice inspection interval (plus the twelve-month extension allowed by the ASME Code). This will ensure that McGuire Unit 1 can operate until the end-of-cycle 8 refueling outage is scheduled to begin on December 11, 1992, and will provide a contingency period in the event of unforeseen revisions to the Unit 1 outage schedule. All required inservice hydrostatic tests will be completed by the conclusion of the end-of-cycle 8 outage.