

DUKE POWER COMPANY

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April 12, 1984

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

Attention: Ms. E. G. Adensam, Chief  
Licensing Branch No. 4

Re: McGuire Nuclear Station  
Docket Nos. 50-369, 50-370

Dear Mr. Denton:

McGuire Technical Specification (TS) require that inservice inspection and testing of various components be performed in accordance with Section XI of the ASME Code and applicable addenda. Snubber testing is included in the edition of the Code which McGuire is using. The code testing requirement must be followed unless written relief has been granted by the NRC.

Technical Specification 3/4.7.8 contains detailed requirements for testing snubbers. In particular this TS contains three alternative sample plans for selecting snubbers to be tested. Duke selected the plan described in 4.7.8.e.(2) as the basis for snubber selection and notified the NRC of this in a letter to Mr. J. P. O'Reilly, NRC/Region II on February 14, 1984 (Attachment 2).

Since the plan for snubber selection in use by Duke differs from that in the Section XI of the ASME Code, written relief from the Code is required pursuant to 10 CFR 50.55a(g)(6)(i). Accordingly, Duke Power Company requests relief from the ASME Code requirement outlined in Attachment 1.

Please advise if there are any questions regarding this request.

Very truly yours,

*H.B. Tucker / HBT*  
Hal. B. Tucker

GAC:glb  
Attachments

cc: W. T. Orders  
Senior Resident Inspector  
McGuire Nuclear Station

Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, Suite 3100  
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Attachment 1

Duke Power Company

McGuire Nuclear Station

Request for Relief from ASME Code Section XI

1. Component for which Relief is Requested.

a. Name and number:

All safety-related snubbers for Units 1 and 2

b. Function:

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads.

c. ASME Section III Code Class:

Provide support for class 1, 2, and 3 systems.

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

ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition through winter 1980 Addenda, Article IWF-5000.

3. Basis for Requesting Relief:

A functional test on 10% of the total number of snubbers, with subsequent samples of an additional 10% if failed snubbers are detected, is an undue burden on stations with a large number of snubbers. Alternate sampling plans in the McGuire Technical Specifications provide acceptable confidence levels of snubber operability but with a potentially smaller sample size. The NRC has reviewed these alternate plans and has found them acceptable in the past. McGuire 1 and 2 have a total of approximately 2855 safety-related snubbers.

4. Alternate Examination:

All safety-related snubbers will be functionally tested per the alternative plan in McGuire Technical Specification 4.7.8.e.(2).

5. Implementation Schedule:

McGuire safety-related snubbers will continue to be functionally tested per the requirements of the Technical Specifications.