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DUKE POWER

May 30, 1995

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

Subject: McGuire Nuclear Station
Docket Nos: 50-369 and 370
Relief Request 94-011: Snubber Inspection Intervals for
Unit 1

Dear Sir:

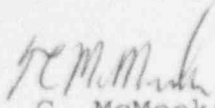
Pursuant to 10 CFR 50.55a(g)(5)(iii), I am submitting the attached relief request for NRC review and approval. Per NRC Generic Letter 90-09 dated December 11, 1990 on 'Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions':

...the staff has developed an alternate schedule for visual inspections that maintains the same confidence level as the existing schedule and generally will allow the licensee to perform visual inspections and corrective actions during plant outages. Because this line item TS improvement will reduce future occupational radiation exposure and is highly cost effective, the alternate inspection schedule is consistent with the Commission's policy statement on TS improvements.

The attached relief request seeks relief from impractical snubber inspection frequencies and will invoke the snubber testing frequency as reflected in the current McGuire Nuclear Station Technical Specifications 3.7.8, Table 4.7-2 which are the same as those reflected in the referenced GL 90-09.

Should there be any questions regarding this matter, please contact James E. Snyder at (704) 875-4447.

Very truly yours,


T. C. McMeekin
Vice President, McGuire Nuclear Station

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DUKE POWER COMPANY
MCGUIRE NUCLEAR STATION

Request for Relief From

ASME Code Section XI Requirements

I. Component for Which Relief is Requested

A. Name and Identification Number

All Unit 1 safety-related snubbers.

B. Function

Snubbers are designed to prevent pipe motion under dynamic loads.

C. ASME Section XI Code Class

Provides support for Class 1,2,3 systems.

D. Valve Category

Not applicable.

II. ASME Code Section Requirement that has been determined to be impractical.

ASME Boiler and Pressure Vessel Code Section XI,
Article IWF-5000.

III. Basis for Requesting Relief

The 1989 ASME Boiler and Pressure Vessel Code Section XI, Article IWF-5300 (a) states: "Inservice examinations shall be performed in accordance with the first Addenda to ASME/ANSI OM-1987, Part 4 (published 1988), using the VT-3 visual examination method described in IWA-2213." Paragraph 2.3.2.2 of the first Addenda to ASME/ANSI OM-1987, Part 4 states that examinations shall be conducted at 18 month intervals $\pm 25\%$.

If unacceptable snubbers are revealed, the interval for subsequent inspections shall be reduced in accordance with the following table:

Number of Unacceptable Snubbers	Months to Subsequent Examination
0	18
1	12
2	6
3,4	4
5,7	2
>8	1

McGuire Unit 1 Technical Specifications 3/4.7.8, SNUBBERS has a surveillance frequency not to exceed 48 months which is altered based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. See the attached copy of the subject TS Table 4.7-2, SNUBBER VISUAL INSPECTION INTERVAL.

The examination interval requirements in the McGuire Unit 1 TS Table 4.7-2 are based on NRC Generic Letter 90-09, 'Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions.' Prior to the incorporation of GL 90-09 into the TS, the examination inspection interval in the TS was identical to that in the first Addenda to ASME/ANSI OM-1987, Part 4. NRC GL 90-09 acknowledged that licensees having a large number of snubbers find that the 18 month visual inspection schedule in the first addenda to ASME/ANSI OM-1987, part 4 is excessively restrictive and that some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements without increasing the confidence level in snubber operability.

McGuire Unit 1 has 346 snubbers subject to the inservice inspection per IWF-5000. McGuire Unit 1 is currently on a fuel cycle length of approximately 18 months. In order to comply with the current ASME requirements of IWF-5000, Duke Power would be required to perform VT-3, visual examinations on all 346 snubbers within the inservice inspection program at every refueling outage. This examination frequency is twice that presently required by the approved TS 3/4.7.8 and significantly greater than that required under Section XI codes through the 1986 edition. As indicated in NRC GL 90-09, this increased inspection per ASME requirements does not increase the confidence level in snubber operability above that obtained by the requirements of NRC GL 90-09.

IV. Alternate Testing

As an alternative to the requirements of ASME Section XI, IWF-5000, paragraph IWF-5300(a) which invokes the inspection frequency in paragraph 2.3.2.2 of the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988), VT-3, visual inspection of snubbers within the Section XI inservice inspection boundaries shall be examined on a schedule as provided by McGuire Nuclear Station TS 3/4.7.8, Table 4.7-2. For the purposes of determining inspection frequency, the snubbers within the inservice boundaries shall be considered part of the total population of snubbers inspected under TS 3/4.7.8.