



**DUKE POWER**

August 5, 1996

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555-0001

Subject: Duke Power Company  
Catawba Nuclear Station, Units 1 & 2  
Docket Nos. 50-413, 50-414

Request for approval to use ASME Code Case N-480  
for evaluation of pipe wall thinning.

Pursuant to 10CFR 50.55a (a) (3) (i & ii), Duke Power Company requests the use of an alternative to the 1974 edition of ASME Boiler and Pressure Vessel Code, Section III for Catawba Units 1 & 2.

Specifically, Duke Power requests approval to use the provisions of ASME Code Case N-480, Examination Requirements for Pipe Wall Thinning Due to Single Phase Erosion and Corrosion, Section XI, Division 1.

This Code Case allows for the evaluation of localized pipe wall thinning and establishes allowable limits under which the pipe may remain in service.

Duke Power Company believes these requirements described in the code above create a hardship in that the repair or replacement of piping creates an exposure to unnecessary dose and personnel hazards. Also, significant economic impact due to extended or unplanned outages can be incurred.

During the current Unit 1 EOC9 refueling outage, wall thinning was discovered immediately downstream of the main feedwater check valves 1CF31, 40, 49 and 58. Of the four degraded sections of pipe, the "D" loop (1CF58) still passes all minimum wall requirements without further evaluation. The "B" loop (1CF40) piping will not pass N-480 and must be repaired or replaced prior to returning the system to service.

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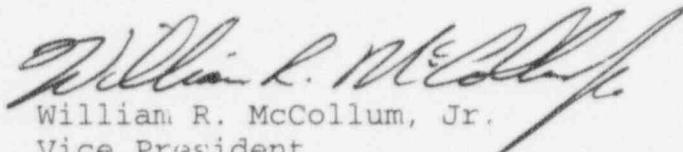
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By invoking N-480 to evaluate loops "A" (1CF31) and "C" (1CF49), their replacement would not be required until 1EOC10 and would not be critical path tasks at that time.

Repair or replacement of the "A" and "C" loops would become critical path tasks and significantly impact the scheduled startup of Unit 1. For this reason, we are requesting review and approval of this request by August 30, 1996 which is just prior to Mode 4.

Should there be any questions concerning this change, please call D. Tower at (803) 831-3419.

Very truly yours,

  
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Vice President  
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