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February 24, 2000

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

SUBJECT: Duke Energy Corporation  
Oconee Nuclear Station Unit 3  
Docket No. 50-287  
Request to use an Alternative to the ASME Boiler  
and Pressure Vessel Code, Section XI in accordance  
with 10CFR50.55a(a)(3)(i).  
Duke Energy Corporation Serial Number 00-002

Pursuant to 10CFR50.55a(a)(3)(i), Duke Energy Corporation (Duke) requests the use of an alternative to the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL, 1992 Edition with the 1992 Addenda for Oconee Unit 3. The proposed alternative and justification is included as an enclosure to this letter.

This alternative to the requirements of IWL-2410(c) and IWL-2420(c) is to be used during the expedited examination period specified in 10CFR50.55a(g)(6)(ii)(B)(2) for Oconee Unit 3. This alternative is desired because Amendment No. 310 (License No. DPR-55) to the Unit 3 Technical Specifications, which was approved January 18, 2000, now precludes Duke from using the alternative permitted by 10CFR50.55a(g)(6)(ii)(B)(4). 10CFR50.55a(g)(6)(ii)(B)(4) would have allowed the concrete and unbonded post-tensioning system examinations conducted during the expedited examination period specified in 10CFR50.55a(g)(6)(ii)(B)(2) to be performed in accordance with the attached proposed alternative.

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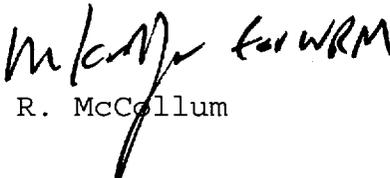
U. S. Nuclear Regulatory Commission  
February 24, 2000  
Page 2

The proposed alternative is requested to allow for a reasonable period in which to complete the expedited examinations required by 10CFR50.55a(g)(6)(ii)(B)(2). The Unit 3 Structural Integrity Test was completed on May, 7, 1974. Therefore, the 25 year concrete and unbonded post-tensioning system examinations performed in accordance with Subsection IWL must be performed between May 7, 1998 and May 7, 2000. As a result of operating cycle changes, Unit 3 refueling outage EOC18 is currently scheduled to begin April 13, 2000 and end May 19, 2000, beyond the May 7, 2000 deadline. Therefore, containment could be technically inoperable from May 7, 2000 until the completion of data analysis and evaluation. Although it is anticipated that the examinations and evaluation of results will be complete prior to entry into Mode 4 during start-up, Duke recognizes the potential for delays (for example, delays in obtaining data and samples due to inclement weather). Duke wishes to minimize the impact of any such scheduling problem by making this request at this time.

Duke requests NRC approval of this request for alternative by March 31, 2000, i.e., two weeks prior to the scheduled start of the Unit 3 refueling outage.

Questions regarding this request may be directed to M. J. Ferlisi at (704) 382-3923.

Very truly yours,

  
W. R. McCollum

Attachment:  
Duke Energy Corporation  
Request for Alternative

U. S. Nuclear Regulatory Commission  
February 24, 2000  
Page 3

xc w/att: L. A. Reyes, Regional Administrator  
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D. E. LaBarge, Senior Project Manager, Section 1  
Project Directorate II  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
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M. E. Shannon, NRC Senior Resident Inspector (ONS)

bxc w/att: L. A. Keller  
L. E. Nicholson  
R. P. Todd  
R. C. Douglas  
D. E. DeMart  
R. A. Heineck  
J. S. Warren  
M. J. Ferlisi  
R. V. Hester  
T. J. Coleman  
NRIA File/ELL

Enclosure: Duke Energy Corporation Request for Alternative  
No. 00-002, Attachment 1, Pages 1 through 3.

DUKE ENERGY CORPORATION  
Request For Alternative  
Oconee Nuclear Station Unit 3

**Applicable Code Edition and Addenda**

ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL, 1992 Edition with the 1992 Addenda.

**Description of Code Requirement(s) for Which an Alternative is Requested**

IWL-2410(c) requires that concrete examinations shall commence not more than 1 year prior to, and shall be completed not more than 1 year after, the dates specified in IWL-2410(a).

IWL-2420(c) requires that unbonded post-tensioning system examinations shall commence not more than 1 year prior to, and shall be completed not more than 1 year after, the dates specified in IWL-2420(a).

**Description of Proposed Alternative**

In lieu of the requirements of IWL-2410(c) and IWL-2420(c), Duke Energy Corporation proposes the following one-time alternative for Oconee Unit 3:

The 10 year and subsequent examinations shall commence not more than 1 year prior to the specified dates and shall be completed not more than 15 months after such dates.

**Justification for Using the Proposed Alternative**

The Unit 3 Structural Integrity Test was completed on May, 7, 1974. As a result, the 25 year concrete and unbonded post-tensioning system examinations performed in accordance with Subsection IWL must be performed between May 7, 1998 and May 7, 2000.

As a result of operating cycle changes, Unit 3 refueling outage EOC18 is not currently scheduled to end until late in May, 2000,

beyond the May 7, 2000 deadline. The proposed alternative is requested to allow for a reasonable period in which to complete the expedited examinations required by 10CFR50.55a(g)(6)(ii)(B)(2).

The previous examinations of the Unit 3 unbonded post-tensioning system were completed on July 20, 1995 in accordance with the Oconee Technical Specifications applicable at the time. The approved Technical Specification schedule for these examinations varied from that specified in the ASME Code, Section XI, Subsection IWL, 1992 Edition with the 1992 Addenda.

The proposed alternative will require the next concrete and unbonded post-tensioning system examinations to be performed in accordance with Subsection IWL no later than August 7, 2000.

The schedule for subsequent concrete and unbonded post-tensioning system examinations for Unit 3 shall comply with IWL-2410(c) and IWL-2420(c), with examinations being performed at 5/7/2004 (+/- 1 year) and every 5 years thereafter.

For examinations starting with those 10 years after the completion of the Structural Integrity Test, examinations may be performed as much as 7 years (84 months) apart, if the +/- 1 year tolerances of IWL-2410(c) and IWL-2420(c) are used. The proposed alternative will require concrete and unbonded post-tensioning system examinations performed on Unit 3 in 2000 to be completed within 61 months of the examinations completed in 1995, and no more than 63 months prior to completion of the next scheduled examinations.

#### **The Quality and Safety Provided by the Proposed Alternative**

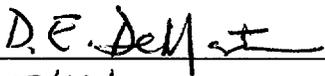
IWL examinations are scheduled at periodic intervals to allow for timely detection of potential damage or degradation that could affect the integrity of the primary containment structure. Use of this alternative will provide an acceptable level of quality and safety because the proposed examination schedule results in examinations being performed more frequently than the maximum of 7 years permitted by Subsection IWL. As such, the proposed alternative will allow potential damage or degradation to be detected earlier than if examinations were conducted in accordance with IWL-2410(c) and IWL-2420(c).

#### **Duration of the Proposed Alternative**

The proposed alternative is requested only for the Unit 3 25-year concrete and unbonded post-tensioning system examinations

performed in accordance with Subsection IWL prior to August 8, 2000.

Originated By:   
Date: 2-16-2000

Approved By:   
Date: 2/16/00