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**M. S. Tuckman**  
Executive Vice President  
Nuclear Generation

June 28, 2001

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

ATTENTION: Document Control Desk

SUBJECT: Duke Energy Corporation

Oconee Nuclear Station - Units 1, 2, & 3  
Docket Nos. 50-269, 50-270, and 50-287

McGuire Nuclear Station - Units 1 & 2  
Docket Nos. 50-369 and 50-370

Catawba Nuclear Station - Units 1 & 2  
Docket Nos. 50-413 and 50-414

Request to use an Alternative to the ASME Boiler  
and Pressure Vessel Code, Section XI in Accordance  
with 10 CFR 50.55a(a)(3)(i).

Duke Energy Corporation Serial Number 01-GO-0002

Pursuant to 10 CFR 50.55a(a)(3)(i), Duke Energy Corporation requests the use of an alternative to the requirements of the ASME Boiler and Pressure Vessel Code, Section XI. The applicable code edition is the 1989 Edition for Oconee Units 1, 2 and 3; McGuire Units 1 and 2 (1995 Edition with 1996 Addenda on McGuire Unit 1 will begin with the third interval on December 1, 2001); and Catawba Units 1 and 2.

This request, Duke Serial Number 01-GO-0002, is to allow the use of ASME Code Case N-416-2, "Alternative Pressure Test Requirement for Welded Repairs, Fabrication Welds for Replacement Parts and Piping Subassemblies, or Installation of Replacement Items by Welding, Class 1, 2, and 3 Section XI, Division 1."

Duke is requesting that the NRC approve this request by September 1, 2001 such that it can be used during the

A047

U. S. Nuclear Regulatory Commission  
June 28, 2001  
Page 2

upcoming fall outages on Catawba Unit 2 and Oconee Unit 3.  
Questions regarding this request may be directed to J. S.  
Warren at (704) 382-4986.

Very truly yours,

*M. S. Tuckman*

M. S. Tuckman

MST/JSW

Attachment

xc w/att: L. A. Reyes, Regional Administrator  
U.S. Nuclear Regulatory Commission, Region II  
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R. E. Martin, NRC Senior Project Manager (MNS)  
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M. C. Shannon, NRC Senior Resident Inspector (ONS)  
D. J. Roberts, NRC Senior Resident Inspector (CNS)  
S. M. Shaeffer, NRC Senior Resident Inspector (MNS)

U. S. Nuclear Regulatory Commission  
June 28, 2001  
Page 3

bxc w/att:       M. R. Wilder  
                  L. E. Nicholson  
                  J. E. Smith  
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                  K. L. Crane  
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                  T. K. Pasour (2)  
                  L. J. Rudy  
                  C. T. Alley  
                  NRIA File/ELL  
                  ONS Master File - ON03DM  
                  MNS Master File - MG01DM  
                  CNS Master File - CN04DM

**DUKE ENERGY CORPORATION**  
**Oconee Units 1, 2, and 3**  
**McGuire Units 1 and 2**  
**Catawba Units 1 and 2**

Pursuant to 10CFR50.55a (a) (3) (i), Duke Energy Corporation requests to use ASME Code Case N-416-2, "Alternative Pressure Test Requirement for Welded Repairs, Fabrication Welds for Replacement Parts and Piping Subassemblies, or Installation of Replacement Items by Welding, Class 1, 2, and 3 Section XI, Division 1".

- I. **System/Component for Which Relief is Requested:** Components covered under the requirements of ASME Section XI, Division 1, Class 1, 2, and 3.
- II. **Code Requirement:** Section XI Article IWA-4000 requires pressure testing for welded repairs or installation of replacement items by welding.
- III. **Code Requirement from Which Relief is Requested:** Relief is requested in accordance with Code Case N-416-2 to allow for a system leakage test in lieu of hydrostatic pressure testing as required by Article IWA-4000 for welded repairs or installation of replacement items by welding.
- IV. **Basis for Relief:** Code Case N-416-2 provides an alternative to the current ASME Section XI repair/replacement rules for hydrostatic testing. The NRC recognizes use of Code Case N-416-1 in Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability – ASME Section XI Division 1", Revision 12 dated May 1999. Code Case N-416-2 provides additional guidance for fabrication welds for replacement parts and piping subassemblies that was not part of Code Case N-416-1.
- V. **Alternative:** Duke Energy Corporation proposes to use the requirements of Code Case N-416-2.
- VI. **Justification of the Relief:** The alternative afforded by this Code Case has been determined by the ASME to provide an acceptable alternative to the existing code requirements. This Code Case does not create any technical changes that would impact the existing ISI program or the Technical Specifications at Catawba, McGuire or Oconee stations nor does it compromise the current levels of safety or quality.
- VII. **Implementation Schedule:** Implementation of this code case is site specific and is scheduled to begin in the fall 2001.

Evaluated By: C. Ken Allen Date 6/20/01

Reviewed By: Michael B. Date 6/20/01