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M. S. Tuckman
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October 9, 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 for Relief From the ASME Boiler and
Pressure Vessel Code, Section XI in Accordance with
10CFR50.55a(g)(6)(i).
Duke Energy Corporation Serial Number 01-GO-004

Pursuant to 10CFR50.55a(g)(6)(i), Duke Energy Corporation
(Duke) requests relief from requirements of the ASME Boiler
and Pressure Vessel Code, Section XI. The applicable code
edition/interval are:

Oconee Nuclear Station, Units 1, 2 and 3: 1989 Edition, Third
Interval

McGuire Nuclear Station, Unit 1: 1995 Edition with 1996
Addenda, Third Interval

McGuire Nuclear Station, Unit 2: 1989 Edition, Second
Interval

Catawba Nuclear Station, Units 1 and 2: 1989 Edition, Second
interval

This request, Duke Serial Number 01-GO-004, is to allow the
use of an examination method to detect and locate leakage in
lieu of the Visual, VT-2 examination method for Class 2 and 3

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air or gaseous systems. The details of this request for relief are contained in the attachment to this letter.

Duke is requesting timely NRC approval of this request since it is necessary to implement the proposed alternative test method during the upcoming Oconee Nuclear Station Unit 3 refueling outage, EOC19.

Also, this alternative test method is being implemented in the current Catawba Nuclear Station Unit 2 refueling outage, EOC11. However, ASME Section XI does not require completion of this Catawba Nuclear Station examination until the end of the second period, which is scheduled to expire August 19, 2003.

Questions regarding this request may be directed to J. S. Warren at (704) 382-4986.

Very truly yours,

M. S. Tuckman

M. S. Tuckman

Attachment

xc w/att: L. A. Reyes, Regional Administrator
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xc w/att: C. P. Patel (Addressee only)
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D. J. Roberts, NRC Senior Resident Inspector (CNS)
S. M. Shaeffer, NRC Senior Resident Inspector (MNS)

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bxc w/att: M. R. Wilder
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C. J. Thomas
K. L. Crane
G. D. Gilbert
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J. M. Boughman
NRIA File/ELL
ONS Master File - ON03DM
MNS Master File - MG01DM
CNS Master File - CN04DM

Duke Energy Corporation

Catawba Units 1 & 2

McGuire Units 1 & 2

Oconee Units 1, 2, & 3

10-Year Interval Request For Relief No. 01-GO-004

Pursuant to 10 CFR 50.55a(g)(6)(i), Duke Energy Corporation requests relief from performing a Visual, VT-2 examination as required by the ASME Boiler and Pressure Vessel Code, Section XI, 1989 Edition for Catawba Units 1 & 2, Oconee Units 1, 2, & 3, and McGuire Unit 2. This request also applies to the ASME Boiler and Pressure Vessel Code, Section XI, 1995 Edition with the 1996 Addenda for McGuire Unit 1.

Specifically, Duke Energy Corporation requests approval to use an examination method to detect and locate leakage in lieu of the Visual, VT-2 examination method for Class 2 and 3 air or gaseous systems (e.g., nitrogen supply, diesel starting air). Duke Energy Corporation has determined that it is impractical to perform a Visual, VT-2 examination for evidence of leakage on air or gaseous systems.

I. Systems/Components for Which Relief is Requested:

All Class 2, Category C-H and Class 3, Category D-A, D-B, & D-C pressure-retaining components in air or gaseous systems subject to IWA-5240, Visual Examination.

II. Code Requirement:

Tables IWC-2500-1 and IWD-2500-1 of the ASME Section XI Code requires a Visual, VT-2 examination method for Class 2 and Class 3 pressure-retaining components in accordance with IWA-5240, Visual Examination.

III. Code Requirement from Which Relief is Requested:

Relief is requested from the mandatory examination method to perform a Visual, VT-2 examination for Class 2 and Class 3 pressure-retaining components in air or gaseous systems.

IV. Basis for Requesting Relief:

Duke Energy Corporation has chosen to classify certain air and gaseous systems as either ASME Class 2 (Quality Group B) or ASME Class 3 (Quality Group C). By classifying these air and gaseous systems as either Class 2 or Class 3, a Visual, VT-2 examination must be performed to detect evidence of leakage. The Visual, VT-2 examination is not practical for detecting leakage if the medium contained in the system is not visible.

Duke Energy Corporation

Catawba Units 1 & 2
McGuire Units 1 & 2
Oconee Units 1, 2, & 3

10-Year Interval Request For Relief No. 01-GO-004

V. Alternate Examinations or Testing:

Duke Energy Corporation proposes to use a rate of pressure loss test in lieu of the Visual, VT-2 examination. Specifically, a test will be performed while the system is at operating temperature and pressure that determines the rate of pressure loss. Duke Energy Corporation, as the owner, will determine the acceptable rate of pressure loss. If the test reveals pressure loss in excess of permissible levels defined by the owner, additional testing will be performed to locate the source of the leakage (e.g., soap bubble “snoop” testing).

VI. Justification for the Granting of Relief:

The ASME Section XI Code is not written for VT-2 examinations to be conducted on non-liquid systems. Therefore, conducting a Visual, VT-2 examination on the surface of pressure retaining components in air or gaseous systems will not ensure leakage integrity.

The proposed test method described in Section V of this document is sufficient to determine the leakage integrity of Class 2 & Class 3 pressure-retaining components in air and gaseous systems.

The ASME Section XI Code uses similar test methodology in IWA-5244 for leakage integrity of buried components.

VII. Implementation Schedule:

Duke Energy Corporation plans to specifically implement the proposed alternative test during the current Catawba Unit 2 refueling outage, EOC11. Duke Energy Corporation also plans to implement the same alternative test for future examinations of air or gaseous systems at Catawba Units 1 & 2, McGuire Units 1 & 2, and Oconee Units 1, 2, & 3.