

April 14, 2003

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

ATTENTION: Document Control Desk

SUBJECT: Duke Energy Corporation
McGuire Nuclear Station, Units 1 & 2
Docket Nos. 50-369, 50-370
Catawba Nuclear Station, Units 1 & 2
Docket Nos. 50-413, 50-414

Relief Request for Alternative to ASME Section XI
Relief Request 03-GO-008

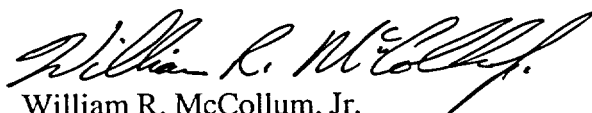
Pursuant to 10 CFR 50.55a (a) (3) (i), Duke Energy Corporation (Duke) requests the use of an alternative to the ASME Boiler and Pressure Vessel Code, Section XI, 1995 Edition through the 1996 Addenda for McGuire Unit 1 (third inspection interval) and the 1989 Edition with no Addenda for Catawba Units 1 and 2 and McGuire Unit 2 (second inspection interval).

Specifically, Duke requests approval to use, as an alternate, the staff-endorsed 1998 Edition through the 2000 Addenda for piping that penetrates the containment vessel when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI.

Regulatory Guide 1.147, Revision 13 is expected to allow the use of the alternative in Code Case N-522, which is the same as the exemption in the 1998 Code Edition. Because Regulatory Guide 1.147, Revision 13 has not yet been published, Duke is requesting the use of the alternative listed in this Relief Request beginning with the McGuire Unit 2 refueling outage, scheduled for September 19, 2003.

A detailed description of the proposed alternative and justification is included as an attachment to this letter. Duke is requesting approval of this request by September 19, 2003 to support the McGuire Unit 2 refueling outage plans. Questions regarding this request may be directed to R. K. Nader at 704-382-0979.

Very truly yours,


William R. McCollum, Jr.
Senior Vice President, Nuclear Support

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Attachment

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E. F. Guthrie, NRC Senior Resident Inspector (CNS)
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C. J. Thomas (MG01RC)
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G. D. Gilbert (CN01RC)
K. E. Nicholson (CN01RC)
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MNS MasterFile (MG01DM)
CNS MasterFile (CN04DM)
ELL

**Duke Energy Corporation
McGuire Nuclear Station – Units 1 & 2
Catawba Nuclear Station - Units 1 & 2
Request For Relief No. 03-GO-008**

Pursuant to 10 CFR 50.55a (a) (3) (i), Duke Energy Corporation requests the use of an alternative to the ASME Boiler and Pressure Vessel Code, Section XI, 1995 Edition through the 1996 Addenda for McGuire Unit 1 (third inspection interval) and the 1989 Edition with no Addenda for Catawba Units 1 & 2 and McGuire Unit 2 (second inspection interval).

Specifically, Duke Energy Corporation requests approval to use, as an alternate, the 1998 Edition through the 2000 Addenda for piping that penetrates the containment vessel when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI.

I. Systems/Components for Which Alternative is Requested:

Class 2 piping that penetrates the containment vessel when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI.

II. Code Requirement:

Section XI, Table IWC-2500-1, of the ASME Code, 1989 Edition through the 1996 Addenda, requires a system pressure test each inspection period for Class 2 piping that penetrates the containment vessel when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI.

III. Code Requirement from Which Alternative is Requested:

Relief is requested from Table IWC-2500-1, Examination Category C-H, for piping that penetrates the containment vessel when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI.

IV. Basis for Requesting Alternative:

The latest Code Edition endorsed by the Nuclear Regulatory Commission (1998 Edition through the 2000 Addenda) allows piping that penetrates the containment vessel to be exempt from the periodic system pressure test when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI.

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V. Alternate Examinations or Testing:

The 1998 Edition through the 2000 Addenda allows piping that penetrates the containment vessel to be exempt from the periodic system pressure test when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI. These penetration configurations are examined in accordance with 10 CFR 50, Appendix J.

VI. Justification for the Granting of Alternative:

The current Code Edition endorsed by the Nuclear Regulatory Commission (1998 Edition through the 2000 Addenda) allows piping that penetrates the containment vessel to be exempt from the periodic system pressure test when the piping and isolation valves perform a containment function and the balance of the piping system is outside the scope of Section XI.

VII. Implementation Schedule:

Regulatory Guide 1.147, revision 13 is expected to allow the use of Code Case N-522 without the limitations that were issued in Regulatory Guide 1.147, revision 12. With the limitations removed, the alternative in Code Case N-522 is the same as the exemption in the 1998 Code Edition. The Code Case was incorporated into the 1997 Addenda. The NRC communicated Regulatory Guide 1.147, revision 13 publication dates at recent ASME Section XI meetings of September 2002, February 2003, and now May 2003. The Regulatory Guide was not published in September 2002 or February 2003 and may not be published in May 2003 as projected. Therefore, Duke Energy is requesting the use of the alternative listed in this Relief Request beginning with the McGuire Unit 2 refueling outage, scheduled for September 19, 2003.

Prepared By: Jim Baughman

Date: 3/20/03

Reviewed By: R. Kevin Rhyme

Date: 3/20/03