Duke Energy Corporation
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July 1, 2003

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, 50-287
McGuire Nuclear Station, Unit 2
Docket No. 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-007

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, IWA-2300, 1989 Edition for the remainder of the third inspection interval of Oconee Units 1, 2, and 3, and the remainder of the second inspection interval of McGuire Unit 2 and Catawba Units 1 and 2.

Specifically, Duke requests relief from the requirement to qualify and certify nondestructive examination (NDE) personnel in accordance with SNT-TC-1A, 1984 Edition with the additional requirements of ASME Section XI, IWA-2300, 1989 Edition. Duke requests approval to use, as an alternate, the requirements to qualify and certify NDE personnel in accordance with Sub-article IWA-2300 of the 1995 Edition through 1996 Addenda of Section XI utilizing the CP-189 qualification and certification program.

A detailed description of the proposed alternative and justification is included as an attachment to this letter. Additionally, an attached table provides a comparison of some of the major requirements of the 1984 Edition of SNT-TC-1A as modified by IWA-2300 of the 1989 Edition of Section XI with the 1991 Edition of CP-189 as modified by IWA-2300 of the 1995 Edition and 1996 Addenda of Section XI. Duke is requesting approval of this request by March 31, 2004, to support training of personnel for implementation during the fall outages. Questions regarding this request may be directed to R. K. Nader at 704-382-0979.

Very truly yours,

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

A047

Attachment

xc w/att: L. A. Reyes, Regional Administrator
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Duke Energy Corporation

McGuire Unit 2

Catawba Units 1 & 2

Oconee Units 1, 2 & 3

10-YEAR INTERVAL REQUEST FOR RELIEF NO. 03-GO-007

Pursuant to 10 CFR 50.55a (a) (3) (i), Duke Energy Corporation proposes an alternative to the requirements of ASME Section XI, IWA-2300, 1989 Edition.

I. Code Requirement

The 1989 Edition of ASME Section XI,IWA-2300, requires qualification of NDE personnel in accordance with a written practice developed in accordance with SNT-TC-1A, 1984 Edition as amended by IWA-2300.

10 CFR 50.55a(g)(6)(ii)(C) requires implementation of the ASME Code, Section XI, Appendix VIII and the supplements to Appendix VIII of the 1995 Edition, 1996 Addenda. By reference, this includes the requirements of Appendix VII and IWA-2300 of the 1995 Edition, 1996 Addenda. The qualification and certification of ultrasonic examiners must be to a written program in accordance with ANSI/ASNT CP-189, 1991 Edition as amended by IWA-2300.

II. Code Requirement for which Relief is Requested

Relief is requested from the requirement to qualify and certify nondestructive examination (NDE) personnel in accordance with SNT-TC-1A, 1984 Edition with the additional requirements of ASME Section XI, IWA-2300, 1989 Edition.

III. Basis for Relief

ASME Section XI, IWA-2300, 1989 Edition requires development and execution of a written practice in accordance with SNT-TC-1A, 1984 to address the qualification and certification of NDE personnel. 10 CFR 50.55a was amended in the Federal Register (67 FR 60531) to require the use of ASME Section XI, 1995 Edition with the 1996 Addenda, for ultrasonic examination with an expedited phased execution of Appendix VIII. This requires Duke Energy Corporation to develop and implement a written practice in accordance with the requirements of ANSI/ASNT CP-189, 1991 Edition for the qualification and certification of NDE personnel performing

ultrasonic examinations of components under the scope of Appendix VIII.

Duke Energy Corporation operates seven nuclear units, six of which are using the 1989 Edition of ASME Section XI and one, McGuire Unit-1, is using the 1995 Edition with the 1996 Addenda. This entails the preparation and implementation and to the extent possible, consolidation of numerous certification requirements, some of which are in conflict. Personnel certified to perform ultrasonic examinations are also certified to perform other nondestructive examinations such as magnetic particle, liquid penetrant and radiography.

A direct comparison of the implementation requirements of the 1984 Edition of SNT-TC-1A as modified by IWA-2300 of the 1989 Edition of Section XI with the 1991 Edition of CP-189 as modified by IWA-2300 of the 1995 Edition and 1996 Addenda of Section XI is considered to be too cumbersome. Therefore, the attached table provides a comparison of some of the major requirements.

IV. Justification for Relief

Utilizing the CP-189 qualification and certification requirements for NDE personnel, for the additional Subsection IWA examinations, is considered equivalent to the qualifications and certifications required by SNT-TC-1A. Additionally, CP-189 is required to be used for the Fourth 10-Year Interval of the Inservice Inspection Program for Oconee Unit-1 beginning in January, 2004 and is already in effect at McGuire Unit-1. Therefore, in lieu of maintaining redundant, possibly conflicting programs, the proposed alternative of maintaining a single program which meets the requirements of CP-189, for the qualification and certification of NDE personnel, will simplify record keeping, satisfy the need to maintain personnel qualifications and certifications, eliminate redundant systems, and provide an acceptable level of quality and safety appropriate for other NDE disciplines.

V. Alternative Provision

Qualification and certification of NDE personnel shall be conducted in accordance with the requirements contained in Sub-article IWA-2300 of the 1995 Edition through the 1996 Addenda of Section XI utilizing the CP-189 qualification and certification program.

VI. Schedule for Implementation

CP-189 with the additional requirements of Section XI, IWA-2300, 1995 Edition through the 1996 Addenda will be used for the remainder of the Third Inspection Interval for Oconee Units 1, 2, and 3; the Second Inspection Interval for Catawba Units 1 and 2 and the Second Inspection Interval for McGuire Unit 2.

Sponsored By James J. McArdle III Date 5-9-03

Reviewed By [signature] Date 5/28/03

Requirement	SNT-TC-1A, 1984			CP-189, 1991				IWA-2300, 1989		IWA-2300, 1995 w/1996	
UT Training	Hours Level I/II			Hours Level I/II				Hours Level I/II		Hours Level I/II	
	GS	HS	2CL								
	40/80	40/40	30/40	40/40				80/80		80/80	
								10 hrs. annual training		10 hrs. annual training	
UT Experience	Level I		Level II	Level I Hrs.		Level II Hrs.		Level I Hrs.	Level II Hrs.	Level I Hrs.	Level II Hrs.
	months		months	Method	Total	Method	Total	250	800	250	800
	3		9	200	400	600	1200				
RT Training	Hours Level I/II			Hours Level I/II				Hours Level I/II		Hours Level I/II	
	GS	HS	2CL								
	88/80	39/40	29/35	39/40				No additional requirements		No additional requirements	
RT Experience	Level I		Level II	Level I Hrs.		Level II Hrs.		No additional requirements		No additional requirements	
	Months		months	Method	Total	Method	Total				
	3		9	200	400	600	1200				
PT Training	Hours Level I/II			Hours Level I/II				Hours Level I/II		Hours Level I/II	
	GS	HS	2CL								
	12/16	4/8	4/4	8/8				No additional requirements		No additional requirements	
PT Experience	Level I		Level II	Level I Hrs.		Level II Hrs.		No additional requirements		No additional requirements	
	months		months	Method	Total	Method	Total				
	1		2	35	130	135	270				

Notes:

1. Training: GS=grammar school, HS=high school, 2CL=2 years college
2. SNT-TC-1A allows simultaneous credit for experience in two or more NDE disciplines when at least 25% of the person's work time is spent on each method for which certification is sought. CP-189 does not allow simultaneous credit.

Requirement	SNT-TC-1A, 1984			CP-189, 1991				IWA-2300, 1989		IWA-2300, 1995 w/1996	
ET Training	Hours Level I/II			Hours Level I/II				Hours Level I/II		Hours Level I/II	
	GS	HS	2CL								
	48/24	8/12	8/8	12/40				No additional requirements		No additional requirements	
ET Experience	Level I		Level II	Level I Hrs.		Level II Hrs.		Level I Hrs.	Level II Hrs.	Level I Hrs.	Level II Hrs.
	months		months	Method	Total	Method	Total	No additional requirements		No additional requirements	
	1		9	65	130	600	1200				
MT Training	Hours Level I/II			Hours Level I/II				Hours Level I/II		Hours Level I/II	
	GS	HS	2CL								
	24/16	12/8	8/4	12/8				No additional requirements		No additional requirements	
MT Experience	Level I		Level II	Level I Hrs.		Level II Hrs.		No additional requirements		No additional requirements	
	Months		months	Method	Total	Method	Total				
	1		3	65	130	200	400				
VT Training	No rules provided.			No rules provided.				Certification to levels comparable to SNT-TC-1A is required by IWA-2300		Certification to levels comparable to CP-189 is required by IWA-2300	
VT Experience	No rules provided.			No rules provided.				Certification to levels comparable to SNT-TC-1A is required by IWA-2300		Certification to levels comparable to CP-189 is required by IWA-2300	

Requirement	SNT-TC-1A, 1984	CP-189, 1991	IWA-2300, 1989	IWA-2300, 1995 w/1996
Level III Education and Experience	4 year college, 1 year experience; or 2 years college, 2 years experience; or 4 years experience	No education or experience requirements, but ASNT Level III certificate is required.	Minimum high school graduate or GED. 4 year college, 1 year experience; or 2 years college, 2 years experience; or 4 years experience	Minimum high school graduate or GED. 4 year college, 1 year experience; or 2 years college, 2 years experience; or 4 years experience
Level III Examinations	Basic, Method and Specific optional. Employer may waive the examinations.	ASNT Basic and Method examinations are required. Employer administered Specific, Practical and Demonstration examinations.	Basic, Method and Specific examinations required. ASNT examinations are not required.	Basic, Method, Specific, Practical and Demonstration examinations required for initial certification. Only Method, Specific, Practical and Demonstration examinations are required for re-certification. The Practical and Demonstration examinations may be waived under certain conditions. ASNT examinations are not required.
Grading of Examinations	70% passing for each examination. 80% composite grade with weighting factor allowed	70% passing for each examination. 80% composite grade with simple average required.	Additional requirements for the ultrasonic method in Appendix VII.	Additional requirements for the ultrasonic method in Appendix VII.