July 14, 2003

Mr. Ronald A. Jones
Vice President, Oconee Site
Duke Energy Corporation
P. O. Box 1439
Seneca, SC 29679

SUBJECT: RELIEF REQUEST FOR SNUBBER VISUAL EXAMINATION AND FUNCTIONAL TESTING - OCONEE NUCLEAR STATION, UNITS 1, 2, AND 3 (TAC NOS. MB6442, MB6443, AND MB6444)

Dear Mr. Jones:

By letter dated September 26, 2002, you requested relief for Oconee Nuclear Station, Units 1, 2, and 3, from the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code Section XI, 1989 Edition with no addenda, Article IWF-5000, with regard to visual examination and functional testing of snubbers. Pursuant to the provisions of Title 10 *Code of the Federal Regulations*, Section 50.55a(a)(3)(i), the NRC staff authorizes the proposed alternative use of Section 16.9.18 of the Oconee Selected Licensee Commitment for snubber visual examination and functional testing, based on a finding that the proposed alternative provides an acceptable level of quality and safety. The relief is authorized for the third 10-year inservice inspection interval of Oconee, Units 1, 2, and 3. Enclosed is the NRC staff's Safety Evaluation.

Sincerely,

/RA/

John A. Nakoski, Chief, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-269, 50-270 and 50-287

Enclosure: As stated

cc w/enc: See next page

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUEST FOR SNUBBER VISUAL EXAMINATION AND FUNCTIONAL TESTING

DUKE ENERGY CORPORATION

OCONEE NUCLEAR STATION UNITS 1, 2 AND 3

DOCKET NOS. 50-269, 270, AND 287

1.0 INTRODUCTION

By letter dated September 26, 2002, Duke Energy Corporation, the licensee, requested relief from the requirements of the American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* (Code), Section XI, 1989 Edition, Article IWF-5000, with regard to visual examination and functional testing of snubbers. Article IWF-5000 references the first Addenda to ASME/ANSI OM-1987, Part 4 (OM Part 4), for the snubber activities. The licensee proposed to perform the snubber examinations and testing under the Updated Final Safety Analysis Report (UFSAR), Chapter 16, Selected Licensee Commitment (SLC) 16.9.18, "Snubbers."

2.0 REGULATORY EVALUATION

The inservice inspection (ISI) of the ASME Code Class 1, 2, and 3 components is to be performed in accordance with Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the ASME Code and applicable addenda as required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Commission, pursuant to 10 CFR 50.55a(g)(6)(i). Section 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if: (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) will meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b), 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable edition of Section XI of the ASME Code for the Oconee, Units 1, 2, and 3 third 10-year ISI interval is the 1989 Edition with no addenda.

Pursuant to 10 CFR 50.55a(g)(5), if the licensee determines that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information will be submitted to the Commission in support of that determination and a request must be made for relief from the ASME Code requirement. After evaluation of the

determination, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and may impose alternative requirements that are determined to be authorized by law, will not endanger life, property, or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed.

Oconee UFSAR, Chapter 16, SLC 16.9.18 was formerly a Technical Specification and had been relocated from the Technical Specifications as a part of the Improved Technical Specifications effort. The licensee stated that this request is similar to one approved by letter dated January 30, 2002, for use at the McGuire Nuclear Station.

3.0 TECHNICAL EVALUATION

The licensee stated in its letter dated September 26, 2002, that for the third inspection interval of the ISI program, the snubber visual examinations and functional testing are required to be performed in accordance with the requirements of ASME Code, Section XI, 1989 Edition with no addenda, Article IWF-5000, that references the first Addenda to ASME/ANSI OM-1987, Part 4 (OM Part 4).

The licensee proposed that in lieu of using Article IWF-5000 of ASME Code, Section XI, the ongoing visual examination and functional testing of all Oconee, Units 1, 2, and 3 ASME Code Class 1, 2, and 3 snubbers be performed in accordance with Oconee SLC 16.9.18. The licensee requested relief from the requirements of ASME Code, Section XI, Article IWF-5000, Subsection IWF-5300(a), (b), and (c).

Oconee SLC 16.9.18 incorporates Generic Letter (GL) 90-09, “Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions,” dated December 11, 1990, that has been approved for use by the NRC. GL 90-09 acknowledges that the 18-month visual inspection schedule (as contained in OM Part 4) is excessively restrictive and that licensees with large snubber populations have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements. GL 90-09 specifically states that its alternate schedule for visual inspection provides the same confidence level as provided by OM Part 4. The licensee stated, therefore, that SLC 16.9.18 provides adequate requirements for visual examination of all safety-related snubbers, including Class 1, 2, and 3 snubbers, and that it maintains an acceptable level of quality and safety equal to or greater than that of the OM Part 4.

ASME Section XI, paragraph IWF-5300(a) requires that visual inspections be performed using the VT-3 visual examination method described in paragraph IWA-2213. SLC inspections are similar to the VT-3 method, but performed by personnel specifically qualified to conduct snubber inspections. The licensee established Employee Training and Qualification Standards (ETQS) to satisfy the training requirements contained in Duke’s Quality Assurance Topical Report as well as other nuclear regulations to qualify personnel to conduct these inspections. The SLC visual inspections are performed using station Maintenance Procedures. The ETQS task number for snubber visual inspection is MM-OT-0918. Individuals performing the visual inspections per the Maintenance Procedures must be qualified to task MM-OT-0918 or be under the direction or supervision of a technically qualified individual in accordance with ETQS. The NRC staff finds this procedure provides satisfactory assurance that quality visual inspections are performed by a competent individual and is, therefore, acceptable.

ASME Section XI, paragraph IWF-5300(c) requires that integral and nonintegral attachments, including lugs, bolting, pins, and clamps, be examined. The licensee stated that the SLC visual inspections require an equivalent examination. These visual inspections verify that: (1) there are no visible indications of damage or impaired operability, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. The staff concludes that these SLC visual inspections provide an equivalent examination for the integral and nonintegral attachments to the examination required by paragraph IWF-5300(c) and, therefore, they are acceptable.

The licensee stated that the existing testing program defined by the SLC is more conservative than OM Part 4. Both programs require testing a minimum of 10 percent of the snubber population every refueling outage. According to the SLC, an additional sample of a minimum of 10 percent must be tested for each snubber that fails the test, whereas OM Part 4 requires that an additional sample of 5 percent be tested for each snubber that fails the test. The licensee stated that the proposed testing requirements described in SLC 16.9.18 are similar to those previously approved in an NRC letter dated January 30, 2002, for Request for Alternative No. 01-004 for McGuire Nuclear Station, Unit 1.

Based on the above, the NRC staff determined that snubber visual examinations and functional testing, conducted in accordance with the SLC, meet the intent of the ASME Code, Section XI, requirements and provide reasonable assurance of snubber operability and component integrity. Therefore, the NRC staff finds the alternative proposed in the relief request provides an acceptable level of quality and safety.

4.0 CONCLUSION

Based on the information provided, the NRC staff concludes that the licensee has presented an adequate justification for the relief requested from the requirements of ASME Code, 1989 Edition with no addenda, Section XI, Article IWF-5000 (that references the first Addenda to OM-1987, Part 4), with regard to visual examination and functional testing of Class 1, 2, and 3 snubbers of Oconee Nuclear Station, Units 1, 2, and 3. The NRC staff determined that the proposed alternative use of the Oconee SLC 16.9.18 for snubber activities would provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the licensee's request for relief for the third 10-year interval of the Oconee, Units 1, 2, and 3 ISI program is authorized.

Principal Reviewer: A. J. Lee

Dated: July 14, 2003

cc:

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