



D.M. JAMIL  
Vice President

Duke Power  
Catawba Nuclear Station  
4800 Concord Rd. / CN01VP  
York, SC 29745-9635

803 831 4251

803 831 3221 fax

August 8, 2003

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 20555

Subject: Duke Energy Corporation  
Catawba Nuclear Station, Unit 2  
Docket Number 50-414  
Request for Relief Number 03-004  
Relief from Minimum Percentage Requirements for  
Second Inspection Period

Pursuant to 10 CFR 50.55a(a)(3)(ii), please find attached Request for Relief 03-004. This request for relief is associated with minimum percentage requirements for Inspection Category B-F, Pressure Retaining Dissimilar Metal Welds. During a conference call with NRC staff on June 12, 2003, Duke Energy Corporation explained that eight of the subject welds were examined during the end of cycle 12 refueling outage with a procedure that was subsequently determined to not meet the qualification requirements of ASME Section XI, Appendix III, III-2200(b) 1989 Edition. This issue is being resolved via the Catawba Corrective Action Program and the affected welds will be re-examined during the end of cycle 13 refueling outage. Duke Energy Corporation indicated that this request would be submitted prior to the end of the second inspection period, which occurs on August 19, 2003.

The attachment to this letter contains all technical information necessary in support of this request for relief. Duke Energy Corporation is requesting NRC review and approval of this request at your earliest opportunity.

There are no regulatory commitments contained in this letter or its attachment.

If you have any questions concerning this material, please call L.J. Rudy at (803) 831-3084.

A047

Document Control Desk  
Page 2  
August 8, 2003

Very truly yours,



Dhiaa M. Jamil

LJR/s

Attachment

xc (with attachment):

L.A. Reyes, Regional Administrator  
U.S. Nuclear Regulatory Commission, Region II  
Atlanta Federal Center  
61 Forsyth St., SW, Suite 23T85  
Atlanta, GA 30303

E.F. Guthrie, Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
Catawba Nuclear Station

R.E. Martin, Senior Project Manager (addressee only)  
U.S. Nuclear Regulatory Commission  
Mail Stop 08-H12  
Washington, D.C. 20555-0001

**DUKE ENERGY CORPORATION**

**STATION: CATAWBA NUCLEAR STATION UNIT 2**

**10-YEAR INTERVAL REQUEST FOR RELIEF NO. 03-004**

Duke Energy Corporation has determined that conformance with certain ASME Section XI Code requirements will create a hardship. Therefore, pursuant to 10CFR50.55a(a)(3)(ii), Duke Energy requests relief from applicable portions of the code.

ASME Section XI Code of Record: 1989 Edition with no addenda

Interval: Second Ten-Year Interval; Second Inspection Period

**I. System/Component(s) for Which Relief is Requested:**

ASME Section XI Code Class 1 Examination Category B-F,  
Pressure Retaining Dissimilar Metal Welds

<u>ID Number</u>	<u>Item Number</u>	<u>Configuration</u>
2SGA-INLET-SE	B05.070.001	SG2A Nozzle to Safe End
2SGA-OUTLET-SE	B05.070.002	SG2A Nozzle to Safe End
2SGD-INLET-SE	B05.070.007	SG2D Nozzle to Safe End
2SGD-OUTLET-SE	B05.070.008	SG2D Nozzle to Safe End
2NC9-02	B05.130.002	SG2A Safe End to Pipe
2NC9-03	B05.130.003	SG2A Safe End to Pipe
2NC15-02	B05.130.014	SG2D Safe End to Pipe
2NC15-03	B05.130.015	SG2D Safe End to Pipe

**II. Code Requirement:**

ASME Section XI 1989 Edition with no addenda, Table IWB-2412-1

**III. Code Requirement from which Relief is Requested:**

Relief is being sought from the requirement to meet the Second Inspection Period minimum percentage requirements for Inspection Category B-F, Pressure Retaining Dissimilar Metal Welds

**IV. Basis for Relief:**

Eight (8) Inspection Category B-F Dissimilar Metal Inservice Inspection Item Numbers were examined during EOC12 with a procedure that failed to meet the qualification requirements of ASME Section XI, Appendix III, III-2200 (b) 1989 Edition. The invalid procedure was discovered after completion of the refueling Outage (EOC12). As a result, the examinations were invalid and could not be credited toward the Second Inspection Period percentages. Since EOC12 was the last outage in the Second Inspection Period, these examinations could not be re-performed by the end of the Second Inspection Period date of August 19, 2003, to meet the Second Inspection Period minimum requirements.

**V. Alternate Examinations or Testing:**

These examinations will be re-performed during EOC13 with a Code acceptable radiographic volumetric examination because no effective ultrasonic technique is available to examine the cast stainless steel reactor coolant system piping elbows.

**VI. Justification for the Granting of Relief:**

These examinations cannot be physically completed to obtain the minimum percentage before the period expires without bringing the unit back off line and subjecting the unit to unnecessary cycling of systems and components and potential problems that could cause. There are no previous indications in these particular welds and there are no industry problems with welds at these locations.

**VII. Implementation Schedule:**

These examinations have been re-scheduled for the next unit refueling outage (EOC13).

Sponsored By:

A. J. Hogge, Jr Date 8/4/03

Approved By:

R. Kevin Rhyme Date 8/4/03