

December 2, 2004

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

Subject: Duke Energy Corporation (Duke)  
McGuire Nuclear Station Units 1 and 2  
Docket Nos. 50-369, 50-370  
Supplement to Relief Request No. 01-003

Reference: (1) Letter addressed to NRC from Mr. H.B. Barron,  
dated June 4, 2002, (2) NRC Safety Evaluation  
Report from Mr. John Nakoski of the NRC, dated  
August 29, 2002 (TAC Nos. MB5281 and MB5282)

In Reference 1, Duke requested relief for portions of ASME Code Class 1 piping and components connected to the Reactor Coolant System (RCS) that are isolated from direct RCS pressure (2235 psig) during normal operation. They are isolated from the reactor coolant loop by their location, either upstream of a check valve, between 2 check valves, or between 2 closed valves that must remain closed during the units startup and operation.

The purpose of this supplement to RFR 01-003 is to 1) amend the hold time pressure given for the Unit 1 alternate testing of "Portion 1" piping from 491 psig to a pressure range from  $\geq 325$  psig, ramping up to 491 psig; 2) amend the minimum pressure value for the actual hold times and test pressures achieved for the Unit 1 tests from 327 psig to 325 psig; and 3) confirm the corresponding Unit 2 portions of isolated class 1 piping were pressure tested (both during hold times and VT-2 examinations) to the acceptable range of  $>300$  psig.

In Section V, "Alternate Testing" of the relief request, Duke proposed as an alternative, to test the various "Portions" of isolated piping to reduced pressure values that range from 300 psig to  $\geq 800$  psig (for both VT-2 examinations and hold times), which provides an acceptable level of assurance of the quality, safety and structural

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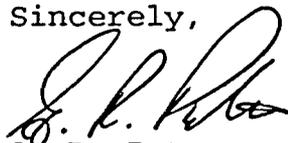
integrity of the tested piping. The actual hold times and test pressures achieved for the Unit 1 tests were reported in the RR as  $\geq 327$  psig, and therefore met the alternate testing acceptance criteria. Duke supplied the actual test pressures and hold times attained in the Unit 1 tests for informational purposes only. The NRC approved the use of the lower pressures on the isolated portions of Class 1 piping in Reference 2.

However, it was later discovered (during planning and preparation for testing the "Portion 1" piping for Unit 2) that the actual alternate pressure maintained during the four hour hold time of the "Portion 1" piping for Unit 1 was ramping upward from a minimum of  $\geq 325$  psig at the start of the four hour hold time to 491 psig at the end of the hold time and beginning of VT-2 examination. The test data for the remaining "Portions 2 through 7" of RR 01-003 was examined and found to be consistent with the information provided in the relief request.

The ramping/changing conditions during the hold time and inspection of the "Portions 1 through 7" piping on Unit 2 were confirmed to remain above the 300 psig minimum pressure acceptance criteria throughout the four hour hold time and VT-2 examination during EOC15. Unit 2 pressure testing deviations from the information for Unit 1 testing provided in Reference 1 are as follows 1) "Portion 1" piping was ramped from 325 psig to 424 psig; 2) "Portion 3" piping was maintained at  $>307$  psig; and 3) "Portion 5" piping was held at  $>307$  psig.

Please direct questions regarding this matter to Norman T Simms of Regulatory Compliance at (704) 875-4685.

Sincerely,



G. R. Peterson

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