

March 23, 2005

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

Subject: Duke Energy Corporation
Catawba Units 1 and 2
Docket Numbers 50-413 and 50-414
Request to Use a Later Edition of the ASME Boiler
and Pressure Vessel Code, Section XI, for
Inservice Inspection Activities at Catawba
Nuclear Station, Units 1 and 2

Pursuant to 10 CFR 50.55a(g)(4)(iv) and in accordance with the guidance provided in NRC Regulatory Issue Summary (RIS) 2004-12, dated July 28, 2004, Duke Energy Corporation hereby requests NRC approval to use the ASME Boiler and Pressure Vessel Code, Section XI, 2001 Edition, Table IWD-2500-1, Category D-B, for Class 3 system pressure testing, commencing on June 29, 2005 for Unit 1 and commencing on March 1, 2006 for Unit 2.

This request is being made for the third ten-year intervals at Catawba Units 1 and 2. These intervals are scheduled to begin on June 29, 2005 for Unit 1 and on March 1, 2006 for Unit 2. Relief Request 05-GO-001 was submitted to the NRC on March 11, 2005 and requested the use of a common edition and addenda of the ASME Boiler and Pressure Vessel Code, Section XI, for inservice inspection activities of Class 1, 2, 3, MC, and CC components at all three Duke Energy Corporation nuclear sites (Oconee, McGuire, and Catawba). This Relief Request also proposed to adjust the start date for the third ten-year interval for Catawba Unit 2 from August 19, 2006 to March 1, 2006. Therefore, this request is being made for both Catawba Units 1 and 2.

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The Unit 1 and 2 inservice inspection plans for the third ten-year interval will be developed according to the 1998 Edition with 2000 Addenda. When using the 2001 Edition, Table IWD-2500-1, Category D-B, there are no related requirements of this Edition that need to be met.

Duke Energy Corporation requests NRC approval of this request by June 29, 2005.

There are no NRC commitments contained in this letter.

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

Very truly yours,

A handwritten signature in black ink, appearing to read 'Dhiam', with a long, sweeping horizontal stroke extending to the right.

Dhiaa M. Jamil

LJR/s

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xc:

W.D. Travers
U.S. Nuclear Regulatory Commission
Regional Administrator, Region II
Atlanta Federal Center
61 Forsyth St., SW, Suite 23T85
Atlanta, GA 30303

E.F. Guthrie
Senior Resident Inspector (CNS)
U.S. Nuclear Regulatory Commission
Catawba Nuclear Station

S.E. Peters (addressee only)
NRC Project Manager (CNS)
U.S. Nuclear Regulatory Commission
Mail Stop 0-8 G9
Washington, D.C. 20555-0001