



BRUCE H HAMILTON
Vice President
Oconee Nuclear Station

Duke Energy Corporation
ON01VP / 7800 Rochester Highway
Seneca, SC 29672

864 885 3487
864 885 4208 fax
bhhamilton@duke-energy.com

October 26, 2006

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

SUBJECT: Duke Power Company LLC d/b/a Duke Energy Carolinas, LLC
(Duke)
Oconee Nuclear Station, Unit 1
Docket Number 50-269
Relief Request 06-ON-004 Request for Additional Information

On August 24, 2006 Duke submitted Relief Request 06-ON-004 pursuant to 10 CFR 50.55a(a)(3)(i), requesting NRC approval to use alternatives to the American Society of Mechanical Engineers Boiler and Pressure Vessel Code (ASME Code), Section XI inservice inspection (ISI) requirements for the Oconee Nuclear Station, Unit 1, 2, & 3. This proposed alternative approach is to support application of full structural weld overlays on various pressurizer nozzle-to-safe end welds and will provide an acceptable level of quality and safety.

By letters dated September 11, 2006 and October 5, 2006, Duke responded to e-mail requests from the NRC Staff for additional information regarding several issues contained within the relief request.

On October 18, 2006, Duke received another request by telephone for clarification on the additional information provided in the October 5, 2006 letter. Upon review, the author of the submittal recognized that a portion of the intended wording had been inadvertently omitted from the Oconee response for question 2. Enclosed is a corrected response to question 2.

A047

Nuclear Regulatory Commission
October 26, 2006
Page 2

If you have any questions or require additional information, please contact Randy Todd at (864)-885-3418.

Sincerely,



Bruce H. Hamilton
Site Vice President
Oconee Nuclear Station

Enclosure

Cc:

W. D. Travers, Region II Administrator
U.S. Nuclear Regulatory Commission
Sam Nunn Atlanta Federal Center, 23 T85
61 Forsyth St., SW
Atlanta, GA 30303-8931

L. N. Olshan., Senior Project Manager (ONS)
U. S. Nuclear Regulatory Commission
11555 Rockville Pike
Mail Stop 8 G9A
Rockville, MD 20852-2738

D. W. Rich
NRC Senior Resident Inspector
Oconee Nuclear Station

ENCLOSURE

OCONEE NUCLEAR STATION
Corrected Response To
Second Request for Additional Information
Request for Relief No. 06-ON-004
Pressurizer Alloy 600 Weld Overlays
(TAC No. MD2887)

NRC Question 2:

Provide a commitment to submit within 14 days from completion of UT examination of the weld overlays, a report that summarizes the results of the examinations, consistent with the September 14, 2006 letter from Exelon to NRC regarding Byron Station, Unit 1 Relief Request 13R-03.

Response

Acceptance of ultrasonic indications in weld overlay repairs using Section XI acceptance criteria has been approved by NRC in past weld overlay applications (e.g. References 1, 2). The following information will be submitted to the NRC within fourteen days of completion of the final UT on each unit included in this relief request. Also included in the results will be a discussion of any repairs to the overlay material and/or base metal and the reason for the repair.

- a listing of flaw indications detected¹
- the disposition of all indications using the standards of ASME Section XI, IWB-3514-2 and/or IWB-3514-3 criteria and, if possible,
- the type and nature of the indications²

¹ The recording criteria of the ultrasonic examination procedure to be used for the examination of the Oconee pressurizer overlays (SI-UT-126 Rev.0) requires that all suspected flaw indications, regardless of amplitude, be investigated to the extent necessary to provide accurate characterization, identity, and location. Additionally, the procedure requires that all indications, regardless of amplitude, that cannot be clearly attributed to the geometry of the overlay configuration be considered flaw indications. SI-UT-126, Rev. 0, is our supplier's procedure for phased array ultrasonic inspection of weld overlays. This procedure is based on the EPRI procedure for manual conventional ultrasonic inspection of weld overlays (PDI-UT-8) and has the same requirements for procedure and personnel qualification.

² The ultrasonic examination procedure states that all suspected flaw indications should be plotted on a cross sectional drawing of the weld and that the plots should accurately identify the specific origin of the reflector.

References

- (1) Safety Evaluation by the Office of Nuclear Reactor Regulation related to Three Mile Island Nuclear Station, Unit 1 (TMI-1) Request for Relief from Flaw Removal, Heat Treatment and Non-Destructive Examination (NDE) Requirements for the Third 10-Year Inservice Inspection (ISI) Interval, Amergen Energy Company, LLC Docket No. 50-289, July 21, 2004.
- (2) Safety Evaluation by the Office of Nuclear Reactor Regulation Inservice Inspection Program Relief Request ISIR-17, Donald C. Cook Nuclear Plant, Unit 1 (DCCNP-1), Indiana Michigan Power, Docket No. 50-315, February 10, 2006.