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SUBJECT: Provides clarification of items with examination results that do not meet acceptance standards of IWL-3000 shall be evaluated to determine applicability of condition to any other units at same site.

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W. R. McCollum, Jr.
Vice President

January 21, 1999

U.S. Nuclear Regulatory Commission
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SUBJECT: Duke Energy Corporation

Oconee Nuclear Station - Units 1, 2, & 3
Docket Nos. 50-269, 50-270, and 50-287
TAC Nos. MA1766, MA1767, and MA1768

Request to use an Alternative to the ASME Boiler
and Pressure Vessel Code, Section XI in accordance
with 10 CFR 50.55a (a) (3) (i).

Duke Energy Corporation Serial Number 98-0002
(Formerly 98-ONS-002)

By letter dated May 6, 1998, Duke Energy Corporation requested the use of an alternative to the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for Oconee Nuclear Station Units 1, 2, and 3. This request would allow the use of an alternative to the examination requirements for post-tensioning systems of concrete containments (Class CC components), as specified in the ASME Code, Section XI, 1992 Edition with the 1992 Addenda, Subsection IWL-2421 and IWL-2521, Table IWL-2521-1. This request for relief was originally designated as Duke Serial Number 98-ONS-0002. In a letter dated July 16, 1998, the NRC requested that additional information concerning this request be submitted to expedite the review process. This additional information was provided in our letter dated September 15, 1998.

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U.S. Nuclear Regulatory Commission
January 21, 1999
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Subsequent discussions with the NRC have indicated that some clarifications would be beneficial to the staff in completing the review of this request. Specifically, it would assist the NRC if Duke Energy Corporation could indicate what additional examinations and/or evaluations are to be performed on other units if the results of examinations on one unit fail to meet the acceptance standards of the ASME Boiler and Pressure Vessel Code, Section XI, Division 1, Subsection IWL, 1992 Edition with the 1992 Addenda, as modified by 10 CFR 50.55a. Duke Energy Corporation would like to clarify that items with examination results that do not meet the acceptance standards of IWL-3000 shall be evaluated to determine the applicability of the condition to any other units at the same site.

Duke Energy Corporation believes that the proposed alternative in this request is superior to that required by Subsection IWL and hopes that the additional clarification provided in this letter will assist the NRC Staff in making their final determination of the acceptability of our request.

If there are any questions or if further information is needed, please contact M. J. Ferlisi at (704) 382-3923.

Very truly yours,



W. R. McCollum, Jr.
Site Vice President

U.S. Nuclear Regulatory Commission
January 21, 1999
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