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SUBJECT: Forwards request for relief from ASME Section XI, 1980 Edition through Winter 1980 Addenda for second 10-yr ISI interval. W/six oversize drawings. See Drawings

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DUKE POWER

November 10, 1993

U.S. Nuclear Regulatory Commission
Attention Document Control Desk
Washington, DC 20555

Subject: Duke Power Company
Oconee Nuclear Station
Docket No. 50-269, 270
Second Ten Year Inservice Inspection Interval
Request for Relief No. 93-03, 07, and 11

Pursuant to 10CFR50, 50.55a, please find the subject Requests for Relief from ASME Section XI, 1980 Edition through the Winter 1980 Addenda. These reliefs are needed due to the undue burden without a compensating increase in the level of quality or safety created in order to perform hydrostatic testing.

The upcoming refueling outages for Units 1 and 2 are the last scheduled outages for the Second Inservice Inspection Interval for these Units. In order to support these outages these requests need to be reviewed and approved by February 1, 1994.

If there are any questions or further information is needed you may contact D. W. Dalton at (803) 885-3372.

Very truly yours,

J. W. Hampton
Site Vice President

Attachment

A047 1/1

xc wo Drawings:

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OCONEE NUCLEAR STATION

Units-1 & 2

Second Ten Year Request

Request # 93-03

1. Component for which relief is requested:

(a) Name and Number:

1 1/2 inch socket weld on the Steam Generator drain valves to be replaced in the upcoming outages. Relief is only for the weld on the generator side of each of following valves.

UNIT-1		UNIT-2	
OTSG-1A	OTSG-1B	OTSG-2A	OTSG-2B
1FDW-141	1FDW-206	2FDW-141	2FDW-206
1FDW-142	1FDW-207	2FDW-142	2FDW-207
1FDW-143	1FDW-208	2FDW-143	2FDW-208
1FDW-144	1FDW-209	2FDW-144	2FDW-209

(b) Function: Steam Generator shell bottom drains.

(c) ISI Class/Duke Class: ASME Class 2/Duke Class F

(d) IWV-2200 Valve Category (If Applicable): N/A

(e) Reference documents: Flow Diagrams OFD-121B-1.5 and 2.5

2. Reference Code Requirement that has been determined to be impractical or excessively burdensome:

IWA-4400(a) "After repairs by welding on the pressure retaining boundary a system hydrostatic test shall be performed in accordance with IWA-5000." And Table IWC-2500-1 for ten year ISI hydrostatic test.

3. Basis for requesting relief:

Due to the inability to isolate any of these welds from the steam generators, performing a hydrostatic pressure test on these 1 1/2 " socket welds would require A) that the steam generators, the main steam lines and over 600 feet of feedwater lines must be filled with water and pressurized and B) temporary supports would have to be installed on the main steam piping. Performing a hydro pressure test would result in an excessive burden without a compensating increase in the level of quality and safety. Performing a hydro pressure test on these welds would also expose the Steam Generators to a needless cycle possibly shortening the life of the steam Generators.

4. Alternate Examination:

The subject welds will receive: A) a nondestructive examination (MT or PT) on the **root pass** of the socket welds, B) a nondestructive examination (MT or PT) on the completed weld and C) a VT-2 pressure test inspection at normal operating pressure.

note: Requesting permanent hydro relief for rest of this interval

5. Acceptability of proposed alternate testing with respect to the level of quality and safety as well as public health and safety:

Normally, these welds would only receive a visual (no surface nor volumetric examinations). The PT or MT nondestructive examinations performed on both the root and final weld passes assures that there are no significant flaws in the welds. The root and final PT/MT examinations provides (to a degree) a volumetric examination dimension.

The VT-2 examinations at normal operating pressure will substantiate the ability of the welds to maintain leak tightness for the conditions they were designed for. Additionally, from a statistics bases, Oconee has a greater than a 95-95 confidence level for acceptable hydro tests.

The alternate examinations along with Oconee's excellent welding record will provide an equal if not greater acceptance level of assurance than from the original requirements without any harmful effects created from cycling the steam generators. Therefore these alternate tests will provide an acceptable level of assurance for the quality of the welds, and the health and safety of the general public will not be diminished.

6. Implementing Schedule:

The nondestructive examinations will be performed as the welds are completed and the VT-2 examinations performed at startup near the end of the refueling outages (RFO). The finish dates for RFOs are projected as follows: 1) Unit-1 June 1994 and 2) Unit-2 Nov 1994.

Requested By: _____ Date: 11.2.93

Reviewed By: _____ Date: 11-2-93

QA Reviewed: _____ Date: 11-2-93

Approved By: _____ TKR Date: 11-5-93