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**ADMIN:** \_\_\_\_\_ **RIDS:** \_\_\_\_\_

REF ID: A6722/88

OCONEE NUCLEAR STATION

Unit- 1 and 2

Second Ten Year Request

Request # 93-07

1. Component for which relief is requested:

(a) Name and Number:

2 inch socket welds on the Core Flood Tank (CFT) side of valves 1CF-20, 1CF-22, 2CF-20 and 2CF-22 (CFT Drain Line Block Valves). One weld for each CFT (2 CFTs per Unit), 4 welds altogether.

(b) Function: CFTs A & B maintenance drains.

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

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

(e) Reference documents: Flow Diagram OFD-102A-1.3 & 2.3

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

ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition with addenda through Winter 1980 Article IWC-5210(2) requires a hydrostatic pressure test for replaced components or altered portions of systems.

3. Basis for requesting relief:

During implementation of modifications, valves 1CF-20, 1CF-22, 2CF-20 and 2CF-22 were replaced during past Refueling Outages. To be in compliance with ASME Code requirements, Oconee has used ASME Code Case N-416 for justification of not performing this hydro at that time. This request is premised on performing a hydro (ten year ISI or repair/replacement) just to examine these two 2" socket welds would result in an excessive burden almost to the point of impractical without a compensating increase in the level of quality or safety.

Although the valve line-up for performing a hydro pressure test would not violate Low Temperature Over Pressurization (LTOP) requirements, LTOP would be challenged. The window of opportunity to perform this test is limited to an extremely small window due to the restrictions of operability, LTOP, personal safety and production of the borated water for the test medium.

A hydrostatic test would dictate the generation of an additional 6,000 gallons of borated water to be added to the 16,600 gallons presently in the CFTs. During the time of the test most of the borated water would have been depleted from the Bleed tanks for defueling or refueling levels. Therefore the majority of the 6,000 gallons would have to be produced from the Boric Acid Mixing Tank (about 500 gallons). It takes about one day to produce the 500 gallon batch of borated water and approximately 10 to 12 days to produce the 6,000 needed gallons. This would extend the RFO several days. After the test, Oconee would have to process this 6,000 gallons of borated liquid waste. The boron would have to be extracted and processed for burial and the water processed to acceptable radiation levels for release.

Oconee would also have to run a temporary line from the basement to the penetration room to supply the hydro pump. This would probably contaminate the hydro pump.

note: Request for Relief NO. 92-05 for Unit-2 was denied per David B. Matthews's June 17, 1992 letter. The denial was based on insufficient information.

4. Alternate Examination:

The subject 2" socket welds received: a nondestructive examination (PT) and a VT-2 pressure test inspection at normal operating pressure. Additionally, the CFTs 1) are checked for pressure twice daily per our Technical Specifications (this is equivalent to a Drop Pressure Test performed daily), 2) are under constant surveillance by operators in the control room, and 3) are monitored by both audio and visual alarms. The pressure is required to be 600 plus or minus 25 PSIG.

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 nondestructive examinations assures that there were no significant flaws in the welds.

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

The alternate examinations, the constant monitoring and daily pressure checks performed on the CFTs (equivalent to a drop pressure test) and Oconee's excellent welding record provides an equal if not greater acceptance level of assurance than from the original ASME requirements without generating unnecessary waste. Therefore an acceptable level of assurance for the quality of the welds has been provided, and the health and safety of the general public has not been diminished.

6. Implementing Schedule:

The nondestructive examinations and the VT-2 examinations have been performed. The Technical Specifications checks on the CFTs pressure for leakage will continue twice daily.

Requested By:	<u><i>Dick Belz</i></u>	Date:	<u>11-2-93</u>
Reviewed By:	<u><i>J. J. Coleman</i></u>	Date:	<u>11-2-93</u>
QA Reviewed:	<u><i>J. S. Mason</i></u>	Date:	<u>11-2-93</u>
Approved By:	<u><i>Dennis Eckert</i></u> <sup>TKR</sup>	Date:	<u>11-5-93</u>