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FBI 6/22/88

OCONEE NUCLEAR STATION
Second Ten Year Request

Request # 93-11

1. Component for which relief is requested:

(a) Name and Number: The ASME Class 3 sections of Feedwater piping supplying the main feedwater for each Steam Generator for Units-1 and 2. These sections route from the Turbine Building to the Auxiliary Building where they connect to the ASME Class 2 piping that continues through the Reactor Building Containment to the Steam Generators. Specifically the ASME Class 3 boundaries are the piping from valve FDW-32 to FDW-37 and from valve FDW 41 to FDW-46 for both units.

(b) Function: Steam Generator main nozzles supply.

(c) ISI Class/Duke Class: ASME Class 3/Duke Class F

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

(e) Reference documents: Flow Diagrams OFD-121B-1.3 and 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) Table IWD-2500-1 requires a System Hydrostatic Test (ten year ISI Hydro) per IWD-5223 on these sections of Class 3 piping.

3. Basis for requesting relief:

Consistent with the philosophy of ASME Code Case N-498, this request is premised upon performing a VT-2 examination at normal operating pressures in lieu of the ten year ISI hydrostatic test. Hydro testing this Class 3 portion (not currently covered by Code Case N-498), which is unisolable from the Class 2 portion, would cause the Class 2 portion to also be hydrostatically tested. The hydrostatic testing of the of the Class 2 portion, in lieu of pressure testing at operating conditions as allowed by Code Case N-498, will result in undue burden without a compensating increase in the level of quality or safety.

Due to the inability to isolate any of these welds from the steam generators, performing a hydrostatic pressure test on any of these sections of piping would require A) that the steam generators, the main steam lines and over 600 feet of feedwater lines (excluding the subject Class 3 piping) 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 on these welds would expose the Steam Generators to a needless cycle possibly shortening the life of the steam Generators.

4. Alternate Examination:

The subject ASME Class 3 piping will receive a VT-2 pressure test inspection at normal operating pressure.

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

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 greater than a 95-95 confidence level the welds would not fail a hydro test.

This alternate examination along with Oconee's excellent welding provides an acceptable level of assurance concerning the quality of the piping sections, and the health and safety of the general public will not be diminished.

6. Implementing Schedule:

The VT-2 examinations will be performed at startup in the upcoming Unit 1 & 2 refueling outages (RFO). The scheduled finish dates for the RFOs for Unit-1 & 2 are the end of June 1994 and the end of November 1994.

Requested By: *T. B. Bly* Date: 11-2-93
Reviewed By: *J. A. Coleman* Date: 11-2-93
QA Reviewed: *J. S. Mason* Date: 11-2-93
Approved By: *D. G. Eubank* ^{TKR} Date: 11-5-93