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SUBJECT: Requests to use alternative to ASME Code Section XI. Util requests approval to use code case N-533.

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DUKE POWER

May 7, 1996

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

Subject: Duke Power Company

Catawba Nuclear Station, Units 1 & 2
Docket Nos. 50-413, 50-414

McGuire Nuclear Station, Units 1 & 2
Docket Nos. 50-369, 50-370

Oconee Nuclear Station, Units 1, 2 & 3
Docket Nos. 50-269, 50-270, 50-287

Request to Use Alternative to ASME Code Section XI
Duke Power Request for Approval of Alternative

Pursuant to 10 CFR 50.55a (a) (3) (i & ii), Duke Power Company requests the use of an alternative to the ASME Boiler and Pressure Vessel Code Section XI for Catawba Units 1 and 2, McGuire Units 1 and 2 and Oconee Units 1, 2, and 3. Specifically, Duke Power requests approval to use the provisions of Code Case N-533, "Alternative Requirements for VT-2 Visual Examination of Class 1 Insulated Pressure-Retaining Bolted Connections, Section XI, Division 1" dated March 14, 1995. This Code Case has not yet been listed in the latest published revision (Revision 11) of NRC Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability-ASME Section XI Division 1." A copy of Code Case N-533 is included as Attachment 1 of this letter.

It is required by the 1989 ASME Code (no addenda), Subsection XI, IWA-5242 (a) "For systems borated for the purpose of controlling reactivity, insulation shall be removed from pressure retaining bolted connections for visual examination VT-2. For other components, visual examinations VT-2 may be conducted without the removal of

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insulation by examining the accessible and exposed surfaces and joints of the insulation. Essentially vertical surfaces of insulation need only be examined at the lowest elevation where leakage may be detectable. Essentially horizontal surfaces of insulation shall be examined at each insulation joint."

Duke believes these requirements described above create a hardship for utilities that results in duplicative work activities and compromises personnel and radiation safety. Compliance with these code requirements would necessitate removal of insulation from all pressure retaining bolted connections for visual examination VT-2 when borated Class I systems are at elevated temperatures and pressures. To remove insulation and perform the VT-2 examination at elevated temperatures and pressures makes inspection more difficult and does not provide for a compensating increase in the level of quality and safety. It is also estimated that utilizing the provisions of this code case would reduce personnel radiation exposure by approximately 20 mr/hr per item. Duke Power believes the same level of quality and safety can be maintained by implementing the alternative means contained in Code Case N-533.

Request for Approval of Alternative Examinations:

Duke Power proposes to apply Code Case N-533 as an alternative to the rules for visual examination of insulated components (IWA-5242) for borated Class 1 systems. Code Case N-533 states that *"It is the opinion of the Committee that, as an alternative to the requirements of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination, the following requirements shall be met.*

(a) A system pressure test and VT-2 visual examination shall be performed each refueling outage without removal of insulation.

(b) Each refueling outage the insulation shall be removed from the bolted connection, and a VT-2 visual examination shall be performed. The connection is not required to be pressurized. Any evidence of leakage shall be evaluated in accordance with IWA-5250."

Catawba Unit 1 begins refueling outage EOC 9 on June 13, 1996. Duke would like to use this alternative examination

at that time. It is requested that a reply granting approval to use Code Case N-533 (copy attached), at least for Catawba Unit 1, be received by June 7, 1996. Duke realizes that the time frame for approval is short, but believes that it is possible based upon previous NRC review and approval of this code case for use by other utilities.

If you have questions concerning this request, please call J. S. Warren at (704) 382-4986.

Very truly yours,

M. S. Tuckman

M. S. Tuckman

MST/JSW/JCS

Attachment: ASME Boiler & Pressure Vessel Code Case N-533

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CASES OF ASME BOILER AND PRESSURE VESSEL CODE

Approval Date: March 14, 1995

*See Numerical Index for expiration
and any reaffirmation dates.*

Case N-533
Alternative Requirements for VT-2 Visual
Examination of Class 1 Insulated Pressure-
Retaining Bolted Connections
Section XI, Division 1

Inquiry: What alternative requirements may be used in lieu of those of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination?

Reply: It is the opinion of the Committee that, as an alternative to the requirements of IWA-5242(a) to remove insulation from Class 1 pressure-retaining bolted connections to perform a VT-2 visual examination, the following requirements shall be met.

(a) A system pressure test and VT-2 visual examination shall be performed each refueling outage without removal of insulation.

(b) Each refueling outage the insulation shall be removed from the bolted connection, and a VT-2 visual examination shall be performed. The connection is not required to be pressurized. Any evidence of leakage shall be evaluated in accordance with IWA-5250.