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 AUTH. NAME AUTHOR AFFILIATION
 HAMPTON, J.W. Duke Power Co.
 RECIPIENT NAME RECIPIENT AFFILIATION
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SUBJECT: Forwards Request for Relief 92-08 from Section XI of ASME Code due to impracticality of pressure testing LPI piping during second 10-yr inservice insp.

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Duke Power Company
Oconee Nuclear Generation Department
P.O. Box 1439
Seneca, SC 29679

J.W. HAMPTON
Vice President
(803)885-3499 Office
(704)373-5222 FAX



DUKE POWER

April 27, 1992

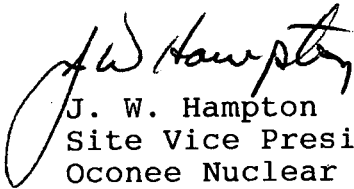
U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Station
Docket No. 50-270
Second Ten Year Interval
Request for Relief No. 92-08

Gentlemen:

Pursuant to 10CFR50, 50.55a, please find attached request for relief number 92-08 from the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (with Addenda through Winter 1980). This request is being submitted due to the impracticality of pressure testing of Low Pressure Injection Piping as required by the Code. The attached request concerns the inservice inspection at Oconee Unit 2 being performed during the second ten year interval. Please review and approve this request prior to the end of the third period of the second ten year interval on February 28, 1994.

Very truly yours,


J. W. Hampton
Site Vice President
Oconee Nuclear Station

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U. S. Nuclear Regulatory Commission
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xc: Mr. L. A. Wiens
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. S. D. Ebnetter
Regional Administrator, Region II
U. S. Nuclear Regulatory Commission
101 Marietta Street, NW., Suite 2900
Atlanta, GA 30323

Mr. Heyward G. Shealy
Bureau of Radiological Health
SC Dept. of Health & Environmental Control
2600 Bull St.
Columbia, SC 29201

Mr. P. E. Harmon
Senior NRC Resident Inspector
Oconee Nuclear Station

Duke Power Company
Oconee Nuclear Station
Second Ten Year Interval
Request for Relief No. 92-08

1. Component for Which Relief is Requested:

(a) Name and Number:

Low Pressure Injection (LPI) Piping between valves 2LP-12 and 2LP-17, and 2LP-14 and 2LP-18.

(b) Function:

2LP-12 and 2LP-14 are on the decay heat cooler discharge and function to throttle flow.

(c) ISI Class/Duke Class:

ISI Class B/Duke Class B/ASME Class 2

(d) IWV-2200 Valve Category:

A

(e) Design Pressure: 470 and 505 psig

Design Temp: 300 and 250° F

Material: 8-inch stainless steel, schedule 20

Drawing: OFD 102A-2.2

II. Reference Code Requirement that has been Determined to be Impractical:

ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition (with Addenda through Winter, 1980) paragraph IWC 5222(a), which states that the system pressure for System Hydrostatic Tests shall be at least 1.25 times the system pressure for systems with Design Temperature above 200° F and Table IWC-2500-1, Category C-H, Item C7.21.

III. Basis for Requesting Relief:

The relief request is to perform a ISI hydrostatic test at a pressure less than the required code test pressure due to the inability to adequately isolate the Decay Heat Coolers.

2LP-12 and -14 are designed for Class 2 seat leakage which permits a leakage rate of 0.5% of rated valve capacity. The section of pipe down stream of 2LP-12 and -14 is designed for 505 psig at 250° F, while the section from the LPI pumps through the Decay Heat Coolers to 2LP-12 and -14 is designed for 370 psig at 300° F. Performing the required hydrostatic test of the line down stream of 2LP-12 and -14 would result in the potential over pressurization of the Decay Heat Coolers.

IV. Alternate Examination:

Hydro test performed at 1.25 times the lesser design pressure of 370 psig (463 psig) with 2LP-12 and 2LP-14 in the open position.

V. Evaluation of Acceptability of Proposed Alternate Testing With Respect to the Level of Quality and Safety as Well as Public Health and Safety:

The specified method of hydrostatic testing verifies that there are no leaks at 1.25 times the design pressure of the Decay Heat Coolers which is greater than the normal operating pressure of the section of piping associated with this relief request. The alternate examination of the hydrostatic test at the lesser design pressure assures the integrity of the system. As such, the proposed alternate examinations provide an acceptable level of quality and safety and will not endanger the health and safety of the public.

VI. Implementation Schedule:

Alternate examination was performed prior to startup from the Unit 2 end of cycle 11 outage in October, 1990.

