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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

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 STOLZ, J. F. PWR Project Directorate 6

SUBJECT: Forwards supplemental info re relief from safety-related snubber inservice insp requirements of Section XI of 1980 Edition of ASME Boiler & Pressure Vessel Code for second 10-yr interval, per 840913, 1116 & 12, 1211 & 860110 ltrs.

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NOTES: AEOD/Ornstein: 1cy. 05000269
 OL: 02/06/73
 AEOD/Ornstein: 1cy. 05000270
 OL: 10/06/73
 AEOD/Ornstein: 1cy. 05000287
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January 31, 1986

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Mr. John F. Stolz, Project Director
PWR Project Directorate No. 6

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287

Dear Sir:

Pursuant to 10 CFR 50, § 50.55a, please find attached a request for relief from the Inservice Inspection requirements of Section XI of the 1980 Edition of the ASME Boiler and Pressure Vessel Code (with addenda through Winter 1980). This request concerns Inservice Inspections at Oconee Units 1, 2, and 3 being performed during the second ten year interval.

This request is considered a supplement to the request made by my letter of September 13, 1984, as supplemented by my letters dated November 16, 1984, December 11, 1984, November 12, 1985, and January 10, 1986. As such, no additional fees are required.

Very truly yours,



Hal B. Tucker

PJN/jgm

Attachment

xc: Dr. J. Nelson Grace, Reg. Admin.
U.S. Nuclear Regulatory Commission
Region II
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Atlanta, Georgia 30323

8602110029 860131
PDR ADOCK 05000269
Q PDR

Mr. J.C. Bryant
Senior Resident Inspector
Oconee Nuclear Station

Ms. Helen Nicolaras
Office of Nuclear Reator Regulation
U.S. Nuclear Regulatory Commission
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A047
Add: Ballou & Encl

DUKE POWER COMPANY
OCONEE NUCLEAR STATION UNITS 1, 2, AND 3

REQUEST FOR RELIEF FROM ASME CODE SECTION XI
(WITH ADDENDA THROUGH WINTER 1980)
INSERVICE INSPECTION REQUIREMENTS

I. Component for which exemption is requested:

- a) Name and Number: All safety-related snubbers
- b) Function: Seismic support
- c) ASME Section III Code Class: N/A
- d) Valve Category: N/A

II. Reference Code Requirement that has been determined to be impractical:
Article IWF-5400

III. Basis for requesting relief:

There is a conflict between the Oconee Nuclear Station snubber Technical Specification 4.18 and the ASME Code concerning snubber functional test sampling methodology. The conflict occurs in the "definition of the population" from which a 10% sample of the total population is to be tested. The ONS Technical Specification requires a 10% representative sample (representative by size, location, randomly selected) be selected from the total population of safety related snubbers, with hydraulic and mechanical snubbers treated separately. In contrast, the ASME Code takes a representative sample which is 10% of the total population, but is selected from previously untested snubbers (until all snubbers have been tested).

Therefore, Duke contends that the Technical Specification sample method provides for superior confidence in total population quality between refueling outages, as it samples a percentage of the total population each refueling. In comparison, the ASME Code introduces population stratification based on the numbers and types of snubbers previously tested (highly dependent on failure rates in certain populations), and is not representative of the total snubber population quality during operation.

IV. Alternative examination:

Functional testing per Oconee Nuclear Station Technical Specification 4.18

V. Implementation Schedule:

Each refueling outage.