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SUBJECT: Forwards requests for relief from requirements of Section XI of ASME Boiler & Pressure Code due to impracticality of pressure testing specific valves following repair. Requests concern inservice insp during second 10-yr interval.

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HAL B. TUCKER  
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September 25, 1987

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Washington, D.C. 20555

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

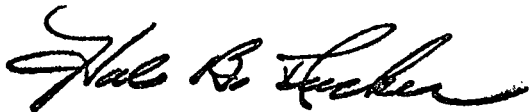
Gentlemen:

Pursuant to 10CFR 50, §50.55a, please find attached requests for relief from the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (with Addenda through Winter 1980). These requests are being submitted due to the impracticality of pressure testing specific valves as required by the Code following repair. The attached requests concern the inservice inspection at Oconee Units 1 and 2 being performed during the second ten year interval.

It is requested that requests for relief for Unit 1 (1FDW-329, 1SF-65, and 1BS-14) be reviewed and approved by NRC by November 3, 1987. For those requests associated with Unit 2 (2HP-188, 2LP-45, and 2LP-19) NRC review and approval is requested by April 28, 1988.

This request is considered to supplement the request made by my letter dated September 13, 1984. As such, no additional fees are required.

Very truly yours,



Hal B. Tucker

PJN/229/jgc

Attachment

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September 25, 1987  
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Duke Power Company  
Oconee Nuclear Station  
Unit 1

I. Component for which relief is requested:

- (a) Name and Number: Feedwater System Valve 1FDW-329
- (b) Function: Steam generator recirculation
- (c) ASME Section III Code Class: 2
- (d) Valve Category: A

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 IWA-5214 which requires a system pressure test per IWA-5211(b). IWA-5211(b) requires that the pressure retaining components within each system boundary shall be subject to system pressure tests under which visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations as referenced in Table IWA-5210-1 may be conducted in conjunction with a system functional test to verify operability in systems (or components) not required to operate during normal plant operation while under system operating pressure.

III. Basis for requesting relief:

1FDW-329 is not used during normal system operation. The required inspection cannot be performed due to the inaccessible location of the valve in a high radiation area.

IV. Alternate examination:

1FDW-329 will be inspected in accordance with IWA-5211(b) during the current Unit 1 refueling outage (end of Cycle 10).

V. Implementation schedule:

1FDW-329 will be inspected while the Unit 1 end of cycle 10 refueling outage is in progress, during the time the Steam generator is in recirculation.

Duke Power Company  
Oconee Nuclear Station  
Unit 1

I. Component for which relief is requested:

- (a) Name and Number: Spent Fuel Cooling System Valve 1SF-65
- (b) Function: Used as a water supply to wash down the refueling cavity and for Axial Power Shaping Rod work.
- (c) ASME Section III Code Class: 3
- (d) Valve Category: A

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 IWA-5214 which requires a system pressure test per IWA-5211(b). IWA-5211(b) requires that the pressure retaining components within each system boundary shall be subject to system pressure tests under which visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations as referenced in Table IWA-5210-1 may be conducted in conjunction with a system functional test to verify operability in systems (or components) not required to operate during normal plant operation while under system operating pressure.

III. Basis for requesting relief:

1SF-65 is not used during normal system operation. The required inspection cannot be performed during system operation as the refueling canal would have to be filled with water in order to put the valve in service.

IV. Alternate examination:

1SF-65 will be inspected in accordance with IWA-5211(b) during the current Unit 1 refueling outage (end of Cycle 10). The inspection will be performed by draining the refueling canal to the reactor building sump.

V. Implementation schedule:

1SF-65 will be inspected during the Unit 1 end of cycle 10 refueling outage.

Duke Power Company  
Oconee Nuclear Station  
Unit 1

I. Component for which relief is requested:

- (a) Name and Number: Reactor Building Spray System Valve IBS-14.
- (b) Function: Reactor Building Spray "A" Header Penetration Check Valve.
- (c) ASME Section III Code Class: 2
- (d) Valve Category: C

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 IWA-5214 which requires a system pressure test per IWA-5211(b). IWA-5211(b) requires that the pressure retaining components within each system boundary shall be subject to system pressure tests under which visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations as referenced in Table IWA-5210-1 may be conducted in conjunction with a system functional test to verify operability in systems (or components) not required to operate during normal plant operation while under system operating pressure.

III. Basis for requesting relief:

IBS-14 cannot be pressurized to perform its normal function since the system is open ended.

IV. Alternate examination:

Permanent relief is requested. Valve leak integrity is ensured by use of approved procedures for valve repair. Valve operability is ensured by partial stroke testing during each refueling outage as specified in the Oconee Nuclear Station Inservice Inspection Program Manual.

V. Implementation schedule:

Permanent relief is requested.

Duke Power Company  
Oconee Nuclear Station  
Unit 2

I. Component for which relief is requested:

- (a) Name and Number: Low Pressure Injection System Valve 2LP-45.
- (b) Function: Auxiliary pressurizer spray
- (c) ASME Section III Code Class: 1
- (d) Valve Category: A

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 IWA-5214 which requires a system pressure test per IWA-5211(b). IWA-5211(b) requires that the pressure retaining components within each system boundary shall be subject to system pressure tests under which visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations as referenced in Table IWA-5210-1 may be conducted in conjunction with a system functional test to verify operability in systems (or components) not required to operate during normal plant operation while under system operating pressure.

III. Basis for requesting relief:

2LP-45 is used to cool down the pressurizer while shutting down the reactor. It is not utilized during normal operations. Thus, testing of 2LP-45 during operation would cause a depressurization event.

IV. Alternate examination:

2LP-45 will be inspected in accordance with IWA-5211(b) during the next Unit 2 cold shutdown of sufficient duration.

V. Implementation schedule:

2LP-45 will be inspected during the next Unit 2 cold shutdown of sufficient duration.

Duke Power Company  
Oconee Nuclear Station  
Unit 2

I. Component for which relief is requested:

- (a) Name and Number: Low Pressure Injection System Valve 2LP-19.
- (b) Function: Suction from Reactor Building Emergency Sump to the Low Pressure Injection Pumps.
- (c) ASME Section III Code Class: 2
- (d) Valve Category: A

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 IWA-5214 which requires a system pressure test per IWA-5211(b). IWA-5211(b) requires that the pressure retaining components within each system boundary shall be subject to system pressure tests under which visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations as referenced in Table IWA-5210-1 may be conducted in conjunction with a system functional test to verify operability in systems (or components) not required to operate during normal plant operation while under system operating pressure.

III. Basis for requesting relief:

2LP-19 cannot be pressurized since the system is open ended.

IV. Alternate examination:

2LP-19 will be inspected in accordance with IWA-5211(b) during the next Unit 2 refueling outage (end of Cycle 9). The system will be pressurized by installation of a flange on the open end.

V. Implementation schedule:

2LP-19 will be inspected during the next Unit 2 end of Cycle 9 refueling outage.



Duke Power Company  
Oconee Nuclear Station  
Unit 2

I. Component for which relief is requested:

- (a) Name and Number: High Pressure Injection System Valve 2HP-188.
- (b) Function: Check valve located in the discharge line of the 2C High Pressure Injection Pump for emergency injection to the Reactor Coolant System B Loop.
- (c) ASME Section III Code Class: 1
- (d) Valve Category: C

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 IWA-5214 which requires a system pressure test per IWA-5211(b). IWA-5211(b) requires that the pressure retaining components within each system boundary shall be subject to system pressure tests under which visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages. The required system pressure tests and examinations as referenced in Table IWA-5210-1 may be conducted in conjunction with a system functional test to verify operability in systems (or components) not required to operate during normal plant operation while under system operating pressure.

III. Basis for requesting relief:

Pressure testing of 2HP-188 during normal operation would unnecessarily cause an additional thermal cycle on the B loop injection nozzles.

IV. Alternate examination:

2HP-188 will be inspected in accordance with IWA-5211(b) during the next Unit 2 refueling outage (end of Cycle 9). The inspection will be performed during check valve testing on 2HP-152 and 2HP-153 (as specified in the Oconee Nuclear Station Inservice Inspection Program Manual).

V. Implementation schedule:

2HP-188 will be inspected during the Unit 2 end of Cycle 9 refueling outage.