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 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co.  
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co.  
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.

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 RECIPIENT AFFILIATION: Office of Nuclear Reactor Regulation  
 Operating Reactors Branch 4

SUBJECT: Advises hydrostatic test required by 1974 edition ASME boiler & pressure vessel code is impractical. Util to follow 1977 edition requirement. Requests notification if unacceptable.

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# DUKE POWER COMPANY

POWER BUILDING

422 SOUTH CHURCH STREET, CHARLOTTE, N. C. 28242

June 11, 1979

WILLIAM O. PARKER, JR.  
VICE PRESIDENT  
STEAM PRODUCTION

TELEPHONE: AREA 704  
373-4083

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

Attention: Mr. R. W. Reid, Chief  
Operating Reactor Branch #4

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

Dear Sir:

Recently, during the testing of a modification to the emergency feedwater system at Oconee Nuclear Station, it was determined that the hydrostatic test required by the approved ASME Boiler and Pressure Vessel Code, Section XI was impractical.

The approved Code — 1974 Edition including through Summer 1975 Addenda — contains in Section XI, Article IWA-5000, System Pressure Test, the requirement to perform a hydrostatic test "for at least four hours prior to the performance of the examinations" (IWA-5210(a)). The performance of this test is impractical particularly in situations where boundary valves used to isolate piping sections for this test are not designed for zero leakage and leak by the seats at a rate greater than the capacity of the hydrostatic pump. In addition, it is not necessary to wait four hours to observe leakage of a welded joint. Any weldment leakage would be readily observable within a matter of minutes.

In a later edition of the Code — 1977 Edition including through Summer 1978 Addenda — the hydrostatic test requirements are stated for conditions of insulated and noninsulated piping. The four hour hydrostatic test is required only for insulated systems while only 10 minutes is required for a noninsulated piping system. However, this edition of the Code is not currently approved by the NRC.

It is the position of Duke Power Company that this later edition of the Code clarifies the previous edition of the Code with respect to the four hour hydrostatic test and is applicable in cases where hydrostatic testing is required. If this is not correct, it is requested that the Commission advise promptly. Absent

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Adol  
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Mr. Harold R. Denton, Director

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further guidance, Duke Power Company will conduct hydrostatic tests consistent with the 1977 Edition of the Code including through Summer 1978 Addenda including direct visual examination of the affected weld during the test.

Very truly yours,

*William O. Parker Jr.*  
William O. Parker, Jr. *by WATT*

RLG:scs