



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 27, 1998

MEMORANDUM FOR: Docket File

FROM: Peter S. Tam, Senior Project Manager  
Project Directorate II-2  
Division of Reactor Projects - I/II *Peter S. Tam*  
Office of Nuclear Reactor Regulation

SUBJECT: CATAWBA NUCLEAR STATION - FACIMILE TRANSMITTAL  
COMMUNICATING QUESTIONS ON DUKE ENERGY  
CORPORATION'S RELIEF REQUEST 98-GO-004 (TAC NOS.  
MA2009, MA2010, MA2011, MA2012, MA2013, MA2014, AND  
MA2015)

The attached message was transmitted by facsimile today to Lee Keller of Duke Energy Corporation (DEC) to prepare him and others for an upcoming conference call. This memorandum and the attachment do not convey a formal request for information or represent an NRC staff position.

Docket Nos. 50-413, 50-414, 50-269, 50-270,  
50-287, 50-369, and 50-370

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**QUESTIONS ON  
CATAWBA NUCLEAR STATION UNITS 1 AND 2  
McGUIRE NUCLEAR STATION UNITS 1 AND 2  
OCONEE NUCLEAR STATION UNITS 1, 2, AND 3**

**RELIEF REQUEST 98-GO-004**

Reference: Letter from M. S. Tuckman to NRC, "Request to use an Alternative to the ASME Boiler and Pressure Vessel Code, Section XI in accordance with 10 CFR 50.55a(a)(3)(i). Duke Energy Corporation Serial Number 98-GO-004," dated May 28, 1998.

- A. In the background of the request for relief, the licensee stated that the requirement to measure illumination level on all surfaces (specifically, surfaces that are at considerable distance and are not readily accessible) will create hardship or unusual difficulty. The licensee proposed, in part, that:
- a) Remote VT-1 and VT-1C examinations may be substituted for direct examination. Remote examination may use aids, such as telescopes, borescopes, fiber optics, cameras, or other suitable instruments, provided such systems have a *resolution capability at least equivalent to that attainable by direct visual examination, or are demonstrated by procedure to be capable of detecting indications for which the direct visual examination is performed.*
  - b) VT-3 and VT-3C examinations may be performed directly or remotely, and may use aids, such as telescopes, borescopes, fiber optics, cameras, or other suitable instruments. *The examination, using natural or artificial lighting, shall be sufficient to resolve a 1/32 in. black line on an 18% neutral gray card, or shall be demonstrated by procedure to be capable of detecting indications for which the visual examination is performed.*

Assuming that the 18% neutral gray card will not be used on a remote examination, describe how the remote examination equipment will be demonstrated to be capable of detecting indications for which the visual examination is intended. To evaluate the technical merit of the proposed alternative, it is necessary to understand the methods that will be used to determine that the examination is capable of detecting indications. Provide a copy of the procedure(s) or portion of procedure(s) describing the methods that will be used to demonstrate the visual examination's capability of detecting indications.