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SUBJECT: Forwards Second 10-yr insp interval Request for Relief 92-11
 from 1980 Edition of ASME Section XI, including winter 1980
 addenda to allow volumetric exam & operational pressure
 test to be used in lieu of required hydrostatic test.

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MAY 1992

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DUKE POWER

July 14, 1992

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

Subject: Duke Power Company
Oconee Nuclear Station
Docket Nos. 50-287
Second 10-Year Inspection Interval
Request for Relief 92-11

Pursuant to 10CFR 50.55a, attached is Request for Relief from the 1980 Edition of ASME Section XI, including Winter 1980 addenda. The request is to allow a volumetric examination and an operational pressure test to be used in lieu of the hydrostatic test required after repairs or replacements by welding. This request is needed due to the inability to isolate two welds in the Emergency Feedwater System from the Steam Generators.

Please review and approve this request by August 31, 1992. On or about this date is when Unit 3 is currently scheduled to reach 200° F in the Reactor Coolant System after its next refueling outage.

Very truly yours,


J. W. Hampton
Site Vice President

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OCONEE NUCLEAR STATION

Second Ten Year Interval

Request # 92-11

1. Component for which relief is requested:

(a) Name and Number: Welds 3-03A-15-31 & -32, used to attach valve 3FDW-345 to the Emergency Feedwater header.

NOTE: The weld number is a unique number assigned to a weld. The weld number is interpreted as follows:

3 Unit number
03A System number {Emergency Feedwater}
15 Isometric drawing number
31 & 32 individual weld numbers.

NOTE: Since weld 3-03A-15-31 falls within the boundary of Code Case N-416, this request is only for weld number 3-03A-15-32. Weld 3-03A-15-31 has been included for reference.

(b) Function: These welds attach valve 3FDW-345 to the Emergency Feedwater System

(c) ISI Class/Duke Class:	ISI Class	Duke Class
3-03A-15-31	B(2)	F
3-03A-15-32	C(3)	F

(d) IWV-2000 Valve Category: Valve 3FDW-345 is a six inch butt weld check valve. It is classified as an active valve, IWV-2200 category C.

(e) Drawings: OFD 121D-3.1
OFD 121B-3.3
Welding Isometric 3-03A-15

2. Reference Code Requirement that has been determined to be impractical:

IWA-4400(a) "After repairs by welding on the pressure retaining boundary, a system hydrostatic test shall be performed in accordance with IWA-5000."

3. Basis for requesting relief:

Performing a hydrostatic test on the welds for this 6" butt weld check valve would require using one of the limited number of allowed hydrostatic pressure tests for the Steam Generator. Per Table 5.2.5 of Oconee's FSAR the Steam Generator is designed for 35 hydrostatic tests over the its life span.

In addition this test would require the filling of the Feedwater and Emergency Feedwater lines back into the Turbine Building, the Steam Generator, and the Main Steam line to the stop valves, this would be a distance of more than 300 feet with an average pipe size greater than 12 inches. This would generate an excessive amount of potentially contaminated water and could result in a slug of water being injected on to the turbine blades when the stop valves were open during unit restart.

4. Alternate Examination:

Weld 3-03A-15-31 will receive a 100% RT and a VT-2 inspection at normal operating pressure as allowed by ASME Code Case N-416 for full penetration welds. Code Case N-416 is acceptable since this weld, and valve 3FDW-345, can not be isolated from the Steam Generator.

Weld 3-03A-15-32 will receive a 100% RT and a VT-2 inspection at normal operating pressure.

5. Acceptability of proposed alternate testing with respect to the level of quality and safety as well as public health and safety:

The preferred method of testing, a hydrostatic test, of weld 3-03A-15-32 would require a test pressure of 1313 psi {1050 psi X 1.25, 1.25 is used since the design temperature of the system is 600 degrees F} and would provide assurance that there are no leaks at the higher than normal pressure.

Weld 3-03A-15-32 is a 6", full penetration weld. The 100% RT of this weld will ensure there are no defects or inclusions that could weaken this weld. The VT-2 at normal operating pressure will provide assurance that the weld is leak tight at normal operating pressure. The combination of a RT and a VT-2 will provide an acceptable level of assurance about the quality of the weld, and that the health and safety of the general public will not be endangered.

Since both welds are located inside the Unit 3 Reactor Building an additional level of assurance, that the health and safety of the general public is not endangered, is provided by the fact that the Reactor Building is designed to contain a leak.

6. Implementation Schedule:

The RT will be performed when the weld has been completed.

The VT-2 will be performed when the system is returned to service at the end of the outage.

Requested By:	<u>Basil W. Carnoy, Jr.</u>	Date:	<u>6/18/92</u>
Reviewed By:	<u>Ted K. Royal</u>	Date:	<u>6/18/92</u>
QA Reviewed:	<u>L. J. Blumh</u>	Date:	<u>6/18/92</u>
Approved By:	<u>Don E. Collier</u>	Date:	<u>6-18-92</u>

FELLSBURG

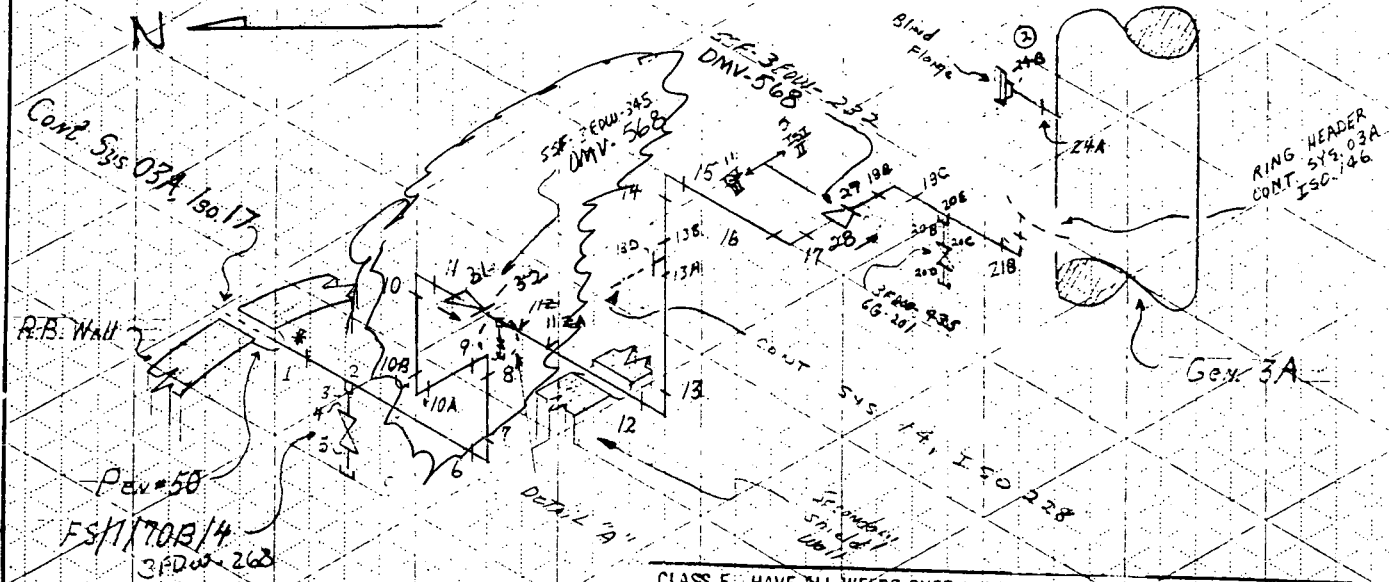
DUKE POWER COMPANY
CONSTRUCTION DEPARTMENT

ISOMETRIC SKETCH

PROJECT CONFE SYSTEM 03A SUB SYSTEMS (1) UNIT 3A ISO. NO. * 15 REV. NO. 20
 CLASS F MATERIAL CPE, CRES WELDING PROCEDURE PSA/PSB/P20 LAST WELD NO. * 32 DATE 6-5-92

Avz. Feedwater - 3A

W.P. P-3 WILL BE USED FOR
 JOINT 24A, 22A, 21A,
 23A



POST WELD HEAT TREAT.	WELD JOINT NO.	DATA SHEET NO.
	24A	30A 14

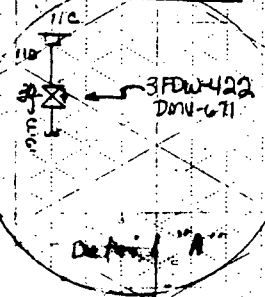
CLASS F - HAVE ALL WELDS OVER 1/2" WALL THICKNESS GROUND FOR 100% RT. HAVE ALL FILLETS, SOCKET, AND SEAL WELDS OVER 4" DIAMETER PREPARED FOR MT/PT. WHEN A WELDER HAS WELDED 20 BUTT WELDS OVER 4" DIAMETER AND 1/2" AND LESS WALL THICKNESS, HAVE IT GROUND FOR RT.

**Bi-metallic

*NOTE

Penetration Pipe, to agree with
 Duke Drawing # 2439C
 Class A NDE per Design Eng.

PS. 600.4
 B3.1



REF. DWG. NOS.	SIZE x WALL THICKNESS	WELD NUMBERS	NDT CODE	ISO. REV. NO.	CHANGES		ISO. REV. NO.	CHANGES	
					WELD NOS.			WELD NOS.	
2480A	6" x .432" 80	1, 6-9, 10A, 10B	F CFE	9	24, 23, 23A, 22A				
2480B		10-17, 20, 21		9	24B				
CFD-121D-3									
050552H	6" x .432" 80	13A, 13B, 13D	F CFE	41	19A-19C, 21R, 20E				
	6" x 1.000" ?	24A	F CFE	5	25, 26, 27				
	6" x .432" 80	31, 32, 19B-19C, 21B	F CFE	91	28, 29, 30, 31, 32, 33, 34				
NSM-2027	1" x .179" 80	2-5	F CFE	0	11A, 11B, 11C, 11D, 11E, 11F, 11G, 11H, 11I, 11J, 11K, 11L, 11M, 11N, 11O, 11P, 11Q, 11R, 11S, 11T, 11U, 11V, 11W, 11X, 11Y, 11Z				
NSM-1012	1" x .179" 80	11C, 11D	F CFE	6	31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100				
SMR 0-31	ATTCH. WELD	11E, 11Z							
PO-121B-3	1" x .179" 80	30							

*ALL WELD NUMBERS SHOWN ABOVE ARE PRECEDED BY THE ISO. NO.

R.L.M.
 3/4" x .154" 80 21B-20E F CFE 6
 6" x .432" 24B CFE 11

