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SUBJECT: Forwards Relief Request 93-12 from ASME Section XI, 1980
Edition through Winter 1980 Addenda re second 10-yr ISI
interval. W/eight oversize drawings.

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DUKE POWER

November 15, 1993

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

Subject: Duke Power Company
Oconee Nuclear Station
Docket No. 50-287
Second Ten Year Inservice Inspection Interval
Request for Relief No. 93-12

Pursuant to 10CFR50, 50.55a, please find the subject Request for Relief from ASME Section XI, 1980 Edition through the Winter 1980 Addenda. This Relief Request is needed due to the undue burden without a compensating increase in the level of quality or safety created in order to perform hydrostatic testing. The alternate examinations will be performed during EOC 14 refueling outage currently scheduled to be completed by February 22, 1994.

The upcoming EOC 14 refueling outage for Unit 3 is the last scheduled outage for the Second Inservice Inspection Interval for this Unit. In order to support this outage these requests need to be reviewed and approved by December 28, 1993.

If there are any questions or further information is needed you may contact D. W. Dalton at (803) 885-3372.

Very truly yours,

J. W. Hampton
Site Vice President

Attachment

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drawings located
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U. S. Nuclear Regulatory Commission
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xc wo Drawings:

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OCONEE NUCLEAR STATION
Unit-3

Second Ten Year Request

Request # 93-12

1. Component for which relief is requested:

(a) Name and Number:

30 inch fillet welds attaching the new slip on flanges for valve replacement 3CCW-93.

(b) Function:

Valve 3CCW-93 is the Unit-3 condenser emergency discharge valve which connects the condenser CCW outlets to the CCW emergency header. The emergency discharge header provides a path for CCW to be discharged back to the intake canal or to the Keowee tailrace. The discharge path back to the intake canal is to mitigate the results of a Keowee Dam break (a weir is provided in the intake canal to assure that a sufficient amount of water is retained for CCW operation). The path to the Keowee tailrace is to mitigate the results from losing the CCW pumps (an unassisted siphon is formed establishing a supply of cooling water through the condenser in order to remove decay heat).

(c) ISI Class/Duke Class: ASME Class 3/Duke Class F

(d) IWV-2200 Valve Category (If Applicable): B

(e) Reference documents: Flow Diagrams

OFD-133A-3.2 OFD-133A-1.2 OFD-133A-2.2
OFD-133A-3.4 OFD-133A-1.5 OFD-133A-2.1
OFD-121C-3.1 OFD-121C-1.1

2. Reference Code Requirement that has been determined to be an impractical or excessively burdensome:

ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition with addenda through Winter 1980 Subarticle IWD-7200 invokes the rules of Article IWB-7000. Then IWB-7400 invokes Article IWA4000 requirements. Within IWA-4400, Subarticles IWA-4400 and IWA-4600 require the performance of a hydrostatic test after attaching a replacement to the system when such attachment is by welding.

3. Basis for requesting relief:

Performing a hydro to examine the fillet welds attaching these two flanges for valve 3CCW-93 would require extensive piping modifications resulting in an excessive burden without a compensating increase in the level of quality or safety.

The inability to isolate valve 3CCW-93 from Units 1 and 2 would make the Emergency CCW inoperable for all three units. This would incur a 7 day LCO. If we could perform the hydrostatic test for these welds the pressurized boundary valves would be:

- UNIT-1: 1CCW-1, 2, 3, 4, 5 and 6; IV-176, 191, 193 and 195.
- UNIT-2: 2CCW-7 and 30.
- UNIT-3: 3CCW-1, 2, 3, 4, 5, 6, and 240; and 3V-195
- UNIT-1,2 & 3: CCW-8 and 9 (generic to all 3 units)

Of the above listed valves, there is a 48 inch, a 24 inch, and twelve 12 inch butterfly valves. The safety function for twelve of these butterfly valves is to open with little concern about seat leakage. With only two 1" hydro connections (CCW drain line taps) available, it is impossible to outrun the valve seat leakage to obtain the hydrostatic test pressure. This means in order to perform the hydrostatic pressure test, Oconee would have to 1) modify one of the drain taps to 2 inches or larger, 2) refurbish some of the valves and 3) possibly replace these valves for one more designed for pressure test boundary functions.

4. Alternate Examination:

The subject welds received a nondestructive examination (PT or MT) and a VT-2 pressure test inspection at normal operating pressure. Additionally, this CCW piping will be tested per a Performance Test Procedure PT/3/A/0261/07 to demonstrate 1) the Emergency Circulating Water System gravity flow can be maintained and 2) the intake Canal recirculation flow path can be established (in the event of dam failure).

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

The PT nondestructive examinations assures that there were no significant flaws in the welds. The VT-2 examinations at normal operating pressure will substantiate the ability of the welds to maintain leak tightness for the conditions they were designed for. The performance test will also demonstrate that the piping will function as designed. Additionally, from a statistical bases, Oconee has a greater than a 95-95 confidence level for acceptable hydro tests.

The alternate examinations, the performance test and Oconee's excellent welding record provides an acceptable level of assurance for the quality of these welds and the health and safety of the general public has not been diminished.

6. Implementing Schedule:

The nondestructive examinations and the VT-2 examinations will be completed during this upcoming refueling outage. The performance test will be performed prior to Unit startup. The refueling outage is scheduled to end in February 1994.

Requested By: Rich Baliga Date: 11-9-93
Reviewed By: Jed K. Royal Date: 11/9/93
QA Reviewed: D. Mason Date: 11-9-93
Approved By: Dennis Forthuit Date: 11-10-93

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