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REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 AUTH. NAME      AUTHOR AFFILIATION  
 TUCKER, H.B.      Duke Power Co.  
 RECIP. NAME      RECIPIENT AFFILIATION  
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SUBJECT: Request for relief 90-05 from requirements of section XI of ASME boiler & pressure vessel code.

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Duke Power Company  
P.O. Box 33198  
Charlotte, N.C. 28242

HAL B. Tucker  
Vice President  
Nuclear Production  
(704)373-4531



**DUKE POWER**

October 23, 1990

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

Subject: Oconee Nuclear Station  
Docket No. 50-270  
Second Ten Year Interval  
Request for Relief No. 90-05

Gentlemen:

Pursuant to 10CFR 50, 50.55a, please find attached request for relief number 90-05 from the requirements of Section XI of the ASME Boiler and Pressure Vessel Code (with Addenda through Winter 1980). This request is being submitted due to the impracticality of pressure testing specific welds as required by the Code following repair. The attached request concerns the inservice inspection at Oconee Unit 2 being performed during the second ten year interval.

Very truly yours,

Hal B. Tucker

LBJ/3/lbj

Attachment

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U. S. Nuclear Regulatory Commission  
October 23, 1990  
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cc: W/Diagram

Mr. L. A. Wiens  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
One White Flint North, Mail Stop 9H3  
Washington, D.C. 20555

W/O Diagram

Mr. S. D. Ebnetter  
Regional Administrator, Region II  
U. S. Nuclear Regulatory Commission  
101 Marietta St., NW., Suite 2900  
Atlanta, Georgia 30323

Mr. Heyward Shealy, Chief  
Bureau of Radiological Health  
S. C. Department of Health and  
Environmental Control  
2600 Bull Street  
Columbia, S. C. 29201

Mr. P. H. Skinner  
NRC Resident Inspector  
Oconee Nuclear Station

Duke Power Company  
Oconee Nuclear Station  
Second Ten Year Interval  
Request for Relief No. 90-05

I. Component for Which Relief is Requested:

(a) Name and Number:

Unit 2 Steam Drain (SD) System welds for installing valves  
2SD-418, 2SD-419, 2SD-420, 2SD-421.

(b) Function:

Drains water which collects at the main steam stop valves.

(c) ISI Class/Duke Class:

ISI Class B/Duke Class F.

(d) IWV-2200 Valve Category:

N/A

(e) Design Pressure: 1050 psig

Design Temp: 630°F

Material: Schedule 80 - 1-inch carbon steel on 2SD-418,  
2-inch carbon steel 2SD-419, 420, and 421

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

III. Basis for Requesting Relief:

In order to perform a hydrostatic pressure test on the welds  
associated with Unit 2 Steam Drain System valves 2SD-418, -419,  
-420, -421, the piping incorporating these valves must be filled  
with water and pressurized. These valves are located in an area  
of the system that is connected to the condenser. Since these  
valves cannot be isolated from the condenser, a hydrostatic test  
would also be performed on the condenser. A hydrostatic test  
would overpressurize the condenser which could cause equipment  
damage and risk the safety of plant personnel.

IV. Alternate Examination:

A liquid penetrant examination will be performed and a VT-2  
inspection will be performed at operating temperature and  
pressure.

V. Evaluation of Acceptability of Proposed Alternate Testing With Respect to the Level of Quality and Safety as Well as Public Health and Safety:

The specified method of hydrostatic testing verifies that there are no leaks at 1.25 times the design pressure. The alternate examination of the penetrant test assures that no significant flaws are evident in the welds. The VT-2 inspection indicates that no leaks are detectable when the system is at operating temperature and pressure. The alternate tests provide an equivalent method to indicate a leak at the higher stress level which is normally verified by the specified method of hydrostatic testing. As such, the proposed alternate examinations provide an acceptable level of quality and safety and will not endanger the health and safety of the public.

VI. Implementation Schedule:

Alternate examinations will be performed when welding is complete and during startup from the Unit 2 end of cycle 11 currently scheduled for October 26, 1990. Hydrostatic testing will be performed during the second ten year interval inservice inspection hydro of the main steam lines.