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RECIP.NAME RECIPIENT AFFILIATION
DENTON,H.R. Office of Nuclear Reactor Regulation, Director
STOLZ,J.F. Operating Reactors Branch 4

SUBJECT: Forwards request for exemption from 10CFR50.12 re common start date for second inservice insp interval at other than 120 months from commerical operation date,Pump & valve testing not adversely affected by shift to new code.

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December 2, 1983

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

Attention: Mr. John F. Stolz, Chief
Operating Reactors Branch No. 4

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

Dear Sir:

By letter dated October 31, 1983, the NRC Staff provided guidance pertaining to the Oconee Inservice Inspection Program. In response to this letter, Duke Power hereby submits a request for exemption pursuant to 10 CFR 50, §50.12. This exemption request concerns a common start date for the second ISI interval for all three Oconee units at other than 120-months from the commercial operation date.

Very truly yours,

Hal B. Tucker

RLG/php

Attachment

cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
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Atlanta, Georgia 30303

Mr. J. C. Bryant
NRC Resident Inspector
Oconee Nuclear Station

Mr. John F. Suermann
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Duke Power Company
Oconee Nuclear Station

Request for Exemption to 10 CFR 50.55a(g)(4)

Pursuant to 10 CFR 50, §50.12, Duke Power hereby requests an exemption to the requirements of 10 CFR 50, §50.55a(g)(4). This section of the code specifically requires that:

> (4) Throughout the service life of a boiling or pressurized water-cooled nuclear power facility, components (including supports) which are classified as ASME Code Class 1, Class 2 and Class 3 shall meet the requirements, except design and access provisions and preservice examination requirements, set forth in Section XI of editions of the ASME Boiler and Pressure Vessel Code and Addenda that become effective subsequent to editions specified in paragraphs (g)(2) and (g)(3) of this section and are incorporated by reference in paragraph (b) of this section, to the extent practical within the limitations of design, geometry and materials of construction of the components.
>
> (i) Inservice examinations of components, inservice tests to verify operational readiness of pumps and valves whose function is required for safety, and system pressure tests, conducted during the initial 120-month inspection interval shall comply with the requirements in the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section on the date 12 months prior to the date of issuance of the operating license, subject to the limitations and modifications listed in paragraph (b) of this section.
>
> (ii) Inservice examinations of components, inservice tests to verify operational readiness of pumps and valves whose function is required for safety, and system pressure tests, conducted during successive 120-month inspection intervals shall comply with the requirements of the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section 12 months prior to the start of the 120-month inspection interval, subject to the limitations and modifications listed in paragraph (b) of this section.
>
> (iii) For a facility whose operating license was issued prior to March 1, 1976, the provisions of paragraph (g)(4) of this section are effective after September 1, 1976, at the start of the next-one third of a 120 month inspection interval. During that third of an inspection interval and the remainder of the inspection interval, the inservice examinations of components, tests to verify operational readiness of pumps and valves whose function is required for safety, and system pressure tests, for such facilities shall comply with the requirements in the latest edition and addenda of the Code incorporated by reference in paragraph (b) of this section on the date 12 months prior to the start of that third of an inspection interval, subject to the limitations and modifications listed in paragraph (b) of this section.

The initial 120-month interval is defined by 10 CFR 50, §50.55a(g)(5)(iv) to start from facility commercial operation.

Duke Power requests an exemption to the above requirements in two aspects for Oconee: (1) a common start date for all three Oconee units; (2) a second interval that starts at other then 120-months after commercial operation. This exemption request applies to both inservice testing of pumps or valves as well as inservice inspection of piping and components.

With respect to the first aspect of a common start date for all three Oconee units, Duke considers that such an action is in keeping with the intent of the Code. The Oconee units came into commercial operation over a period of 19 months as follows:

Unit 1 July 15, 1973
Unit 2 September 9, 1974
Unit 3 December 16, 1974

Literal interpretation of the Code would require the second 120-month interval to begin:

July 1983 for Unit 1
September 1984 for Unit 2
December 1984 for Unit 3

The applicable ASME Code for Unit 1 is, as stated in §50.55(b)(2), the 1980 Edition and addenda through the winter 1980 Addenda. The applicable ASME Code for Units 2, 3 has not been established because the cutoff date of six months prior to the end of the initial 120-month interval (March 1984 for Unit 2, June 1984 for Unit 3) has not yet been reached.

Thus, if a common date were not established, inservice inspection and testing at Oconee would be accomplished for some period of time to two different ASME codes. Duke considers this to be unacceptable and, although administratively possible, could contribute to increased personnel errors in the performance of testing requirements to two different versions of the Code. Therefore, the exemption is requested to allow a single start date for all three Oconee units.

With respect to the second aspect of a second interval that starts at other than 120 months after commercial operation, Duke considers this to be a conservative interpretation of the Code requirement. The ASME Code requires that the inservice examination and system pressure test required by IWB, IWC, and IWD shall be completed during each of the inspection intervals for the service lifetime of the plant.

In addition, Section IWA-2400 of the ASME Code allows the inspection interval of 10 years to be decreased or extended (but not cumulatively) by as much as 1 year for inspections required by IWB, IWC, IWD. By their inherent nature, the inspections performed in accordance with IWV and IWP are not affected by a change in inspection interval length.

Thus, Duke concluded that for the inservice inspection program, the proposed second interval start date of April 1, 1984 was consistent with the ASME code which allowed the initial interval to be completed at other than exactly 120 months, and the fact that all of the 10-year ISI efforts on Oconee will be completed by that date. This will allow an orderly transition into the second interval and implementation of the inspection requirements of the new ASME Code. The inservice testing of pumps and valves is not adversely affected by the shift to the new code at less than 120 months. The date of July 1, 1982 was arbitrarily set following NRC approval of the previously submitted IST program by letter dated March 25, 1982.

Had Duke waited until July 1983 to start the new IST program, the applicable ASME Code for Unit 1 would still have been the 1980 Edition and addenda through the winter 1980 Addenda. This is in fact the ASME Code which is applicable for the actual Duke start date of July 1982. In accepting a common start date for all three units at a single site, the conclusion can be made that the July 1982 start date is acceptable for all units at Oconee Nuclear Station. There are inherent advantages of the 1980 Edition of the Code over its 1974 predecessor, the Code upon which the Oconee IST had been previously based. The newer Code is clearer in certain areas of requirements and has revised certain requirements based on earlier experience. Thus, Duke considers that a conservative interpretation of 10 CFR 50.55a(g)(4) has been made with respect to completion of the initial inspection interval at other than 120 months.

The foregoing statements support our exemption request to allow a common start date for inservice inspection and testing for all three Oconee units and for that common start date to be at other than 120 months from commercial operation of any one unit. Duke requests that this exemption request be promptly reviewed and approved by the NRC.