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 FACIL: 50-269 Oconee Nuclear Station, Unit 1, Duke Power Co. 05000269
 50-270 Oconee Nuclear Station, Unit 2, Duke Power Co. 05000270
 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287

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SUBJECT: Forwards request for relief, 88-01, from ASME XI Boiler & Pressure Vessel Code. Request submitted due to impracticality of required pressure testing specific welds & concerns util inservice insp. W/two oversize drawings.

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 TITLE: OR Submittal: Inservice Inspection/Testing/Relief from ASME Code

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March 7, 1988

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

Subject: Oconee Nuclear Station
Docket Nos. 50-269, -270, -287
Second Ten Year Interval
Request for Relief No. 88-01

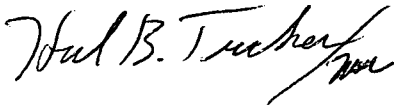
Gentlemen:

Pursuant to 10CFR 50, §50.55a, please find attached request for relief number 88-01 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 requests concern the inservice inspection at Oconee Unit 2 being performed during the second ten year interval.

It is requested that this request for relief be reviewed and approved by NRC prior to Unit 2 Cycle 10 startup currently scheduled for April 10, 1988.

This request is considered to supplement the request made by my letter dated September 13, 1984. As such, no additional fees are required.

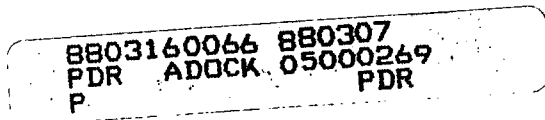
Very truly yours,



Hal B. Tucker

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Attachment



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March 7, 1988
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xc: w/o flow diagrams

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Duke Power Company
Oconee Nuclear Station
Second Ten Year Interval
Request for Relief No. 88-01

I. Component for which relief is requested:

- (a) Name and Number: Low Pressure Injection (LPI) System welds for installing valves 2LP-131, 2LP-132, and 2LP-133 (see attached flow diagrams)
- (b) Function: 2LP-131 is a swing check valve installed to break the ISI Class A to B on the high pressure injection auxiliary pressurizer spray line to the normal spray line. 2LP-132 and 2LP-133 are gate valves installed to provide double isolation of the intersystem LOCA leak path from the auxiliary pressurizer spray line to LPI headers A and B respectively.
- (c) ISI Class/Duke Class: 2LP-131 ISI Class A/Duke Class B
2LP-132 ISI Class B/Duke Class B
2SP-133 ISI Class B/Duke Class B
- (d) Valve Category: N/A

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-5211(d), which states that pressure retaining components within each system boundary shall be subject to system pressure tests under which conditions visual examination VT-2 is performed in accordance with IWA-5240 to detect leakages.

The required system pressure tests and examinations, as referenced in Table IWA-5210-1, may be conducted in conjunction with one or more of the following system tests or operations:

- (d) a system hydrostatic test conducted during a plant shutdown at a pressure above nominal operating pressure.

III. Basis for requesting relief:

It is impractical to perform a hydrostatic test of the welds associated with installation of valves 2LP-131, 2LP-132, and 2LP-133. The piping and welds associated with the installation of these valves cannot be isolated from the Reactor Coolant System. Hydrostatic testing of these valves would unnecessarily place additional hydrostatic test cycles on the Reactor Coolant System.

IV. Alternate examination:

A liquid penetrant examination and an inservice leak inspection at operating temperature and pressure will be performed to verify the integrity of the welds.

V. Evaluation of acceptability of proposed alternate testing with respect to the level of quality and safety as well as public health and safety:

Duke Power Company Design Engineering has specified in the Oconee Piping Installation Specification alternate non-destructive examinations/pressure tests which have been determined to meet the intent of Section XI IWA-2240. IWA-2240 requires the alternative examination methods to be equivalent or superior to those of the specified method.

The specified method of hydrostatic testing verifies that there are no leaks at 1.25 times the design pressure. The alternate test for socket welds is a dye penetrant test and a leak test at operating temperature and pressure. This is equivalent to the hydrostatic test for the following two reasons. First, the leak test at operating temperature and pressure verifies there are no leaks at the operating stress levels. Secondly, the dye penetrant test verifies there are no significant through-the-wall flaws that might initiate a failure after cycling. The combined 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:

The alternate examination will be performed during the Unit 2 End of Cycle 9 refueling outage.

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