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SUBJECT: Forwards Request for Relief 88-03 from requirements of Section XI of ASME boiler & pressure vessel code (w/addenda through Winter 1988). Requests re inservice insp performed during second 10 yr interval. W/one oversized drawing.

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March 15, 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. 88-03

Gentlemen:

Pursuant to 10CFR 50, §50.55a, please find attached request for relief number 88-03 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

PJN/302/jgc

Attachment

A047
1/1
DRAWINGS TO
REG FILES

xc: w/o flow diagrams
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Duke Power Company
Oconee Nuclear Station
Second Ten Year Interval
Request for Relief No. 88-03

I. Component for which relief is requested:

(a) Name and Number: Feedwater (FDW) System welds for installing valves 2FDW-206, 2FDW-209, and 2FDW-144 (see attached flow diagram)

(b) Function: 2FDW-144 is a drain valve off the 2A Once Through Steam Generator (OTSG). 2FDW-206 and 2FDW-209 are drain valves off the 2B OTSG.

(c) ISI Class/Duke Class: ISI Class B/Duke Class F

(d) IWV-2200 Valve Category: B

II. Reference Code requirement that has been determined to be impractical:

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.

Paragraph IWC-5210(a) states that the pressure retaining components within each system boundary shall be subjected to the following system pressure tests and visually examined by the method specified in Table IWC-2500-1, Examination Category C-H:

(2) a system hydrostatic test [IWA-5211(d)] for each system or portion of systems and for repaired or replaced components, or altered portions of systems.

III. Basis for requesting relief:

The piping and welds associated with installation of the valves cannot be isolated from the steam generators. Hydrostatic testing of these valves would require hydrostatic testing of the steam generators and associated piping. Hydrostatic testing of the steam generators would require filling the main steam lines with water and would unnecessarily place additional hydrostatic test cycles on the steam generators.

IV. Alternate examination:

A liquid penetrant examination and a VT-2 inspection at operating temperature and pressure will be performed to verify the integrity of the welds. In addition, the welds will be hydrostatically tested during the second ten year interval inservice inspection hydro of the main steam lines.

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 these 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 liquid penetrant examination will be performed during the current Unit 2 End of Cycle 9 refueling outage. The VT-2 inspection will be performed during startup from the current Unit 2 End of Cycle 9 refueling outage. Hydrostatic testing will be performed during the second ten year interval inservice inspection hydro of the main steam lines.

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