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SUBJECT: Forwards Request for Relief 88-06 from Section XI ASME boiler & pressure vessel code. W/one oversize drawing.

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DUKE POWER

August 23, 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. 88-06

Gentlemen:

Pursuant to 10CFR 50, §50.55a, please find attached request for relief number 88-06 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 3 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 3 Cycle 11 startup currently scheduled for September 18, 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/375/mmj

Attachment

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August 23, 1988

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xc: w/o diagrams

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Duke Power Company
Oconee Nuclear Station
Second Ten Year Interval
Request for Relief No. 88-06

I. Component for which relief is requested:

- (a) Name and Number: Main Steam (MS) System welds for installing valves 3MS-83 and 3MS-85 (see attached flow diagram).
- (b) Function: 3MS-83 and 3MS-85 prevent backflow between main steam headers 3A and 3B respectively.
- (c) ISI Class/Duke Class: ISI Class C/Duke Class F
- (d) IWV-2200 Valve Category: C

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:

Hydrostatic testing would require filling the main steam lines with water. The piping and welds associated with installation of the 3MS-83 and 3MS-85 cannot be isolated from the main steam headers based on past experience using 3MS-82 and 3MS-84 as boundary valves, and past experience with trying to make the main steam system water tight. In addition, the emergency feedwater pump turbine could potentially be damaged by the required hydrotest.

IV. Alternate examination:

Welds will be 100% radiographed and a VT-2 inspection will be performed at operating temperature and pressure. 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:

The specified method of hydrostatic testing verifies that there are no leaks at 1.25 times the design pressure. The alternate examination of a 100% radiograph of welds 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:

The 100% radiograph will be performed during the Unit 3 End of Cycle 10 refueling outage. The VT-2 inspection will be performed during startup from the Unit 3 End of Cycle 10 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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