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SUBJECT: Requests relief from requirements of Section XI of ASME
 Boiler & Pressure Vessel Code re second 10-yr insp interval.

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December 9, 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. 88-09

Gentlemen:

Pursuant to 10CFR 50, 50.55a, please find attached request for relief number 88-09 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 1 being performed during the second ten year interval.

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

SEL/368/mmF

Attachment

8812210063 881209
PDR ADDCK 05000269
P PNU

A047
1/2

xc: w/o diagrams

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Oconee Nuclear Station
Second Ten Year Interval
Request for Relief No. 88-09

I. Component for which relief is requested:

- (a) Name and Number: Spent Fuel Pool Cooling system welds for installing valve 1SF-89 (see attached flow diagram).
- (b) Function: Valve 1SF-89 is a check valve which prevents backflow through Spent Fuel Cooling Pump 1C.
- (c) ISI Class/Duke Class: ISI Class C/Duke Class C
- (d) IWV-2000 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:

Valve 1SF-89 cannot be isolated from the discharge of the 1C Spent Fuel Pool Cooling Pump. Hydrostatic testing of the pump could damage mechanical seals which are rated for 150 psig.

IV. Alternate examination:

Subject welds will be 100% radiographed 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 not 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.

I. Implementation Schedule:

The 100% radiograph will be performed when welding is complete. The VT-2 inspection will be performed during system startup.

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