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50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
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RECIP.NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Forwards Request for Relief 89-05 from requirements of Section XI of ASME Boiler & Pressure Vessel Code.

NOTES:

	RECIPIENT ID CODE/NAME PD2-3 LA WIENS,L	COPII LTTR 1	ES ENCL 0 1	RECIPIENT ID CODE/NAME PD2-3 PD	COPI LTTR 5	
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June 22, 1989

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

Subject: Oconee Nuclear Station

Docket Nos. 50-269, -270, -287

Second Ten Year Interval Request for Relief No. 89-05

Gentlemen:

Pursuant to 10CFR 50, 50.55a, please find attached request for relief number 89-05 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 request concerns the inservice inspection at Oconee Unit 2 being performed during the second ten year interval.

Very truly yours,

Hal B. Tucker

PJN/6/td

Attachment

AOYT

Document Control Desk June 22, 1989 Page 2

cc: W/O Diagrams

Mr. S. D. Ebneter
Regional Administrator
U. S. Nuclear Regulatory
Commission - Region II
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Mr. Heyward Shealy, Chief Bureau of Radiological Health S. C. Department of Health and Environmental Control 2600 Bull Street Columbus, SC 29201

Mr. P. H. Skinner NRC Resident Inspector Oconee Nuclear Station Duke Power Company Oconee Nuclear Station Second Ten Year Interval Request for Relief No. 89-05

I. Component for which relief is requested:

(a) Name and Number: Auxiliary Steam (AS) System welds

for installing valve 2AS-39 (see

attached flow diagram).

(b) <u>Function</u>: 2AS-39 prevents backflow between

the Main Steam and Auxiliary Steam

Systems.

(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 of Auxiliary Steam System lines with water. Based on past experience the Auxiliary Steam header cannot be drained properly after being filled with water due to the lack of adequate low point drains in the system. Water left in the auxiliary steam header following the required hydrotest could potentially damage the emergency feedwater pump turbine.

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