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 50-287 Oconee Nuclear Station, Unit 3, Duke Power Co. 05000287
 50-369 William B. McGuire Nuclear Station, Unit 1, Duke Powe 05000369
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 50-413 Catawba Nuclear Station, Unit 1, Duke Power Co. 05000413
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SUBJECT: Responds to Generic Ltr 89-08, "Erosion/Corrosion-Induced Pipe Wall Thinning."

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July 21, 1989

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Washington, D.C. 20555

Subject: Oconee Nuclear Station, Units 1, 2, and 3
Docket Nos. 50-269, 270, and 287
McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 370
Catawba Nuclear Station, Units 1 and 2
Docket Nos. 50-413 and 414

**Response to Generic Letter 89-08, Erosion/Corrosion-Induced Pipe Wall
Thinning**

Gentlemen:

By your letter dated May 2, 1989 you requested Duke to provide assurances that procedures or administrative procedures are in place to assure that the NUMARC program or another equally effective program has been implemented (long term implementation) and that the structural integrity of all high energy carbon steel systems is maintained.

At all three of our nuclear stations we are actively involved in an established Pipe Erosion Program developed to ensure the integrity of two-phase and single-phase piping systems susceptible to erosion. An engineering review to identify piping susceptible to erosion/corrosion was initiated at our Oconee station in 1976. An Erosion Task Force was established to review high and low pressure extraction steam piping. Following an erosion induced pipe failure at Oconee several years later, the scope of the erosion program was expanded to include other piping and systems. By 1982, we had begun gathering baseline measurements for selected piping systems at our McGuire and Catawba stations. As a result of the Surry Unit 2 Pipe Rupture Event in 1986, the scope and responsibilities of our erosion program were expanded, and the program was renamed to the Pipe Erosion Control Program. This enhanced program is intended to provide a coordinated and consistent long term program at all of our nuclear stations.

A program manual was also developed to provide guidelines for programmatic consistency. The Pipe Erosion Control Manual defines the departmental interfaces required to oversee the program scope and objectives, provides guidance to nuclear station personnel regarding piping inspection requirements, provides a means of monitoring utility experience with respect to piping failure, and serves as a guide for the individual station programs. The Pipe Erosion Control Manual has been issued to all three nuclear stations.

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A detailed engineering review of high energy piping systems was performed for all three nuclear stations. These reviews identified systems, lines, and components which are potentially susceptible to erosion. This review, previous inspection data, calculated erosion rates, and company and industry experience are used to plan and prioritize inspections. Normally, most inspections are performed during outages when the subject piping is at lower temperatures due to safety concerns; however, some inspections are performed on-line. The inspection data is reviewed and recorded as part of the unit specific manuals.

The individual station programs are implemented as described below:

Oconee Nuclear Station

The program and associated manual are addressed in Maintenance Directive 5.3.6. Inspections are routinely performed as part of the preventative maintenance/inservice inspection program.

McGuire Nuclear Station

The program and associated manual are addressed in Maintenance Management Procedure 4.2. Inspections are routinely performed as part of the preventative maintenance program using standing work requests.

Catawba Nuclear Station

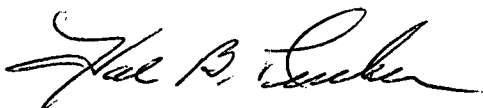
The program and associated manual are addressed in Maintenance Management Procedure 3.0. Station Maintenance Engineering Services is working on a Technical Support program for this area. Inspection work is routinely performed as part of the preventative maintenance program using standing work requests.

We are satisfied our existing program meets the guidelines of the NUMARC program and that we have implemented formalized procedures and administrative controls to ensure continued long term implementation of our erosion/corrosion monitoring program for piping and components. We will also continue to monitor this issue throughout the industry and make appropriate adjustments as deemed appropriate.

If you have any questions, please contact S.E. LeRoy at 704-373-6233.

I declare under penalty of perjury that the statements set forth herein are true and correct to the best of my knowledge.

Very truly yours,



Hal B. Tucker

SEL/437

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