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SUBJECT: Forwards Request for Relief 89-11 from ASME Code criteria re CRD mechanisms, per second 10-yr inservice insp interval.

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March 1, 1990

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. 89-11

Gentlemen:

Pursuant to 10 CFR 50, Part 50.55a, please find attached request for relief number 89-11 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 examining control rod drive mechanisms (CRDMs) as required by the code following disassembly. Request 89-11 concerns the inservice inspection at Oconee being performed during the second ten year interval.

Very truly yours,

Hal B. Tucker
Hal B. Tucker

PJN106/td

Attachments

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March 1, 1990
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Duke Power Company
Oconee Nuclear Station
Second Ten Year Interval
Request for Relief 89-11

I. Component for which relief is requested:

Control Rod Drive Mechanism (CRDM) motor tube to nozzle pressure retaining bolting.

ISI Class I Duke Class A

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) Table IWB-2500 Item B7.80 which requires CRDM bolting material to undergo VT-1 visual examination when disassembled. The intent of this code requirement is to assure the disassembled bolting material is acceptable for re-use and to increase confidence that there is not a generic problem occurring that should be further investigated through additional inspections.

III. Basis for requesting relief:

Per Oconee Nuclear Station Policy CRDM bolting material removed due to exposure to RCS leakage is not re-used because the excessive boron deposit degradation destroys it for further use. It is replaced during maintenance for flange leakage by new material that has a pre-service examination performed on it prior to installation. The boron deposit degradation makes it virtually impossible to perform a meaningful inservice inspection. As a result, table IWB 2500 Item B7.80 requirements for VT-1 examination of bolting material (when CRDMs are disassembled due to RCS leakage indications) are unnecessary since the material will not be re-used and is in no condition to disclose any possible generic problems. In addition VT-1 examination of the bolting material which will not be re-used involves significant unnecessary radiation exposure to personnel.

IV. Alternate examination:

Each refueling outage all CRDM flanges will be visually examined per station procedures for evidence of leakage in compliance with the Oconee Nuclear Station response to NRC Generic Letter 85-05 and IE Bulletin 82-02. Corrective action (including replacement of affected bolting) will be based upon the results of those examinations. Inspection of bolting material during CRDM maintenance not associated with flange leakage will be performed in accordance with the requirements of Table IWB 2500 Item B 7.80.

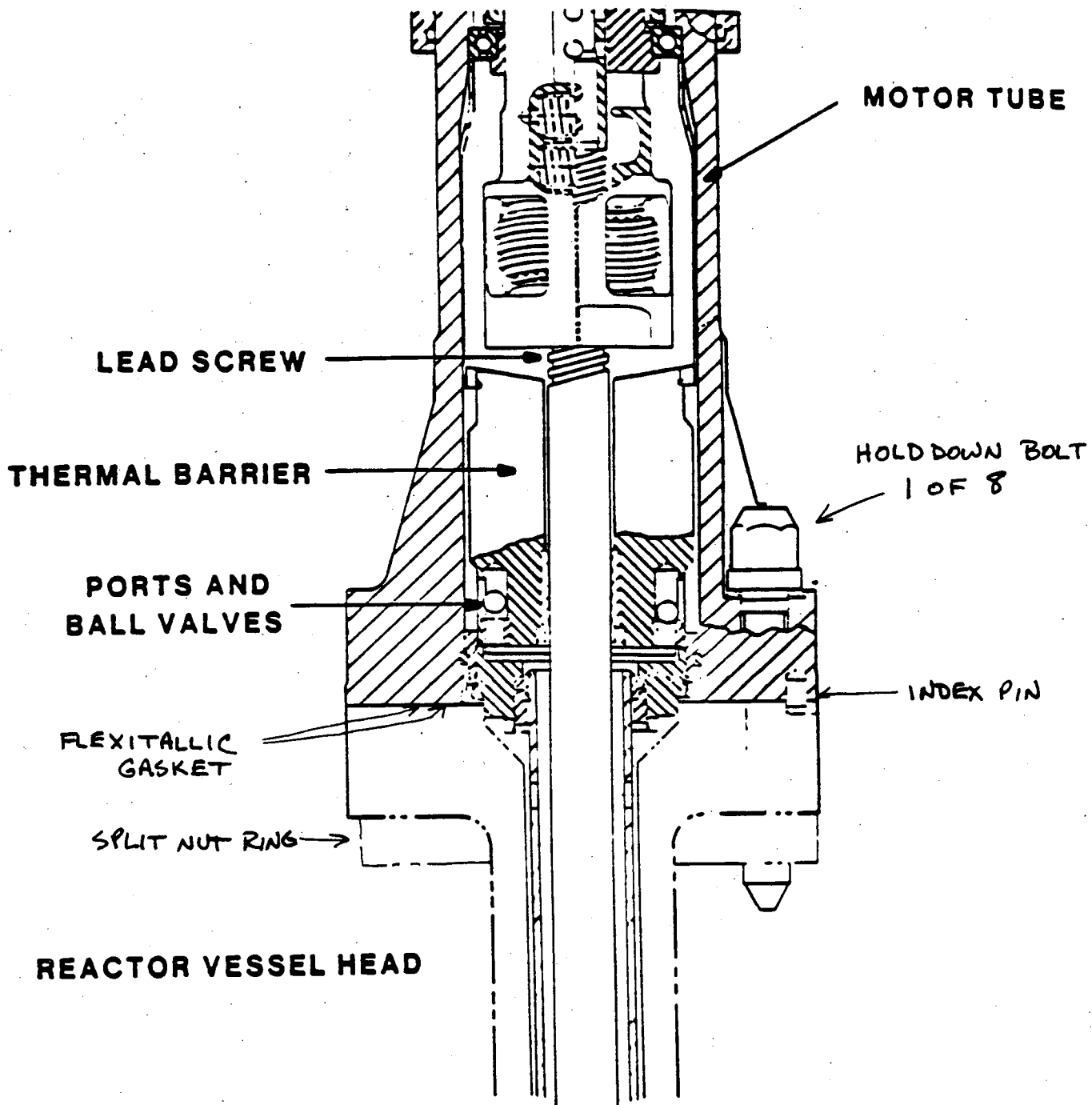
V. Acceptability of proposed alternate testing with respect to the level of quality and safety as well as public health and safety:

Automatic replacement of bolting material removes the necessity for examination of the material for continued service. Pre-service

examination of replacement material ensures the achievement of an acceptable level of safety for the replacement material.

VI. Implementation schedule:

To be placed in effect for all Oconee Units for the remainder of the interval commencing with the upcoming, April 1990 Oconee Unit 1 end of cycle 12 refueling outage.



<p>TITLE:</p> <p>CONTROL ROD DRIVE MECHANISM</p>	<p>NOTES:</p> <p>THERMAL BARRIER</p>	<p>ID NO. OC-PNS-CRD-10 DATE 12-3-86</p> <p>REV. Diamond Power 7032551058-M</p> <p>DRW. BY: DMC / ARB APP. BY: <i>KPB</i></p> <p>TRAINING USE ONLY</p>
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