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SUBJECT: Forwards Request for Relief 94-08 from ASME Section XI, 1980 Edition, including Winter 1980 Addenda to allow use of alternative tests for standby shutdown facility fuel oil sys.

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**DUKE POWER**

September 06, 1994

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

Subject: Duke Power Company  
Oconee Nuclear Station, Unit 1  
Docket No. 50-269  
Second Ten Year Inservice Inspection Interval  
Request for Relief No. 94-08

Pursuant to 10 CFR 50.55a, attached is a Request for Relief from ASME Section XI, 1980 Edition, including the Winter 1980 Addenda. This request is to allow Duke Power to use alternative tests which provide an acceptable level of quality and safety in lieu of the required ASME Section XI tests and examinations for the Standby Shutdown Facility Fuel Oil System.

If there are any questions or further information is needed you may contact D. A. Nix at (803) 885-3634.

Very truly yours,

J. W. Hampton  
Site Vice President

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U. S. Nuclear Regulatory Commission  
Page 2

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OCONEE NUCLEAR STATION  
Unit-1  
Second and Third Ten Year Inspection Intervals  
Request # 94-08

1. Component for which relief is requested:

(a) Name and Number: Standby Shutdown Facility Fuel Oil System (SSF)

(b) Function: Provides the inventory and distribution of fuel oil for the SSF diesel engines.

(c) ISI Class/Duke Class: ISI Class 3 / Duke Class C

(d) Construction Code and Class: ASME III, 1974 Edition,  
Summer 1975 Addenda,  
Class 3

(e) Reference documents (drawings, manuals, etc.)

Flow Diagram OFD 135A-1.2

2. Reference Code Requirement that has been determined to be excessively burdensome:

ASME Boiler and Pressure Vessel Code Section XI, 1980 Edition, including Winter 1980 Addenda, and 1989 Edition; Table IWD-2500-1, Examination Category D-B, requires pressure retaining components be Visually Examined, VT-2, during a system pressure test once each Inspection Period and during the Hydrostatic test once each Inspection Interval.

3. Basis for requesting relief:

Duke Power proposes to use alternative tests which provide an acceptable level of quality and safety in lieu of the required ASME Section XI tests and Examinations.

4. Alternate Examination:

Each month the SSF diesels are started and run unloaded to assure they are functioning properly. Each quarter the SSF diesels are auto started and run, under load, for at least 60 minutes to assure they will perform their safety function. Each time the SSF diesels are run or when any evolution is performed that could change the fuel oil inventory, operations personnel verify the fuel oil inventory. If the unaccounted

fuel oil inventory changes by more than 500 gallons, approximately 1% of the tank capacity, this must be reported for evaluation. Each shift, operations personnel perform rounds of the SSF. Looking for indication of fuel oil leaks are a part of these rounds. Each quarter, the SSF Fuel Oil Transfer Pump is run, transferring oil from the Fuel Oil Storage Tank to the Fuel Oil Day Tank, assuring it is functioning properly.

Duke proposes to use the above tests and processes in lieu of the ASME required tests and examinations.

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

The SSF Fuel Oil System is comprised of two atmospheric storage tanks and is open ended with design pressures ranging from atmospheric to 65 PSIG. Based on the design and configuration of this system, ASME Section XI specifies the two tanks on this system be visually examined during the hydrostatic test. The hydrostatic head developed with the tank filled to design capacity would be used as the test pressure. Adequate flow is required to satisfy the hydrostatic test for the remainder of the system. The hydrostatic test, with the associated visual examination is required to be performed once during each 10 Year Inspection Interval.

Once during each Inspection Period (approximately 3 years), the system is required to be visually examined for leakage during a system pressure test.

The Fuel Oil Storage Tank and the Fuel Oil Day tank are constantly under static head pressure. The Oconee Technical Specifications requires the level of fuel oil to be maintained at a minimum of 25,000 gallons in the Fuel Oil Storage Tank and 200 gallons in the Fuel Oil Day Tank. Through the SSF rounds each shift and the monitoring of the fuel oil inventory, leakages that would prevent the SSF diesels from performing their intended safety function would be identified and corrected. Leakages that would be acceptable under the acceptance criteria of an ASME Section XI pressure test would be unacceptable as a part of the normal operation of the SSF due to the fire hazard and environmental impact these leakages could cause. The Oconee Technical Specifications also requires the fuel oil from both tanks be sampled quarterly for water and sediment. This sampling would give an indication of any in-leakage to these tanks.

As a part of testing, the SSF diesels and SSF Fuel Oil Transfer Pump, the entire Fuel Oil System is verified as

capable of meeting its required safety function. This verification is performed at more frequent intervals than the intervals required by ASME Section XI.

The alternative testing and monitoring specified above provide an acceptable level of quality and safety in lieu of the required ASME Section XI tests and visual examinations.

6. Implementation Schedule:

The alternative tests and monitoring of the SSF Fuel Oil System are in place and being performed.

Requested By: Tih Bely Date: 8.29.94

Reviewed By: Vid K. Royal Date: 8/30/94

QA Reviewed: DS Mason Date: 8-30-94

Approved By: Bay Hulsajn Date: 8/30/94

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