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       50-287 Oconee Nuclear Station, Unit 3, Duke Power Co.      05000287

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 RECIPIENT NAME      RECIPIENT AFFILIATION  
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SUBJECT: Forwards suppl info re 940825 response to deviation noted in  
 Insp Repts 50-269/94-19, 50-270/94-19 & 50-287/94-19. DPC  
 contends that no compliance or safety issues exist re insp  
 requirements for all 1 inch NPS & less piping.

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**DUKE POWER**

September 20, 1994

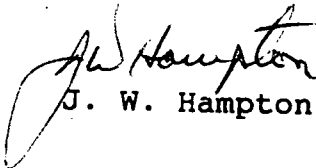
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Subject: Oconee Nuclear Site  
Docket Nos. 50-269, -270, -287  
Inspection Report 50-269, -270, -287/94-19  
Reply to Notice of Deviation  
Supplemental Information

Dear Sir:

By letter dated August 25, 1994 Duke Power responded to a Notice of Deviation as described in Inspection Report No. 50-269/94-19, 50-270/94-19, and 50-287/94-19. Duke is submitting supplemental information regarding the response to Deviation 94-19-02 as requested by the Resident Inspector. The supplemental information is contained in the attachment.

Very truly yours,

  
J. W. Hampton

attachment

cc: Mr. S. D. Ebnetter, Regional Administrator  
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager  
Office of Nuclear Reactor Regulation

Mr. P. E. Harmon  
Senior Resident Inspector  
Oconee Nuclear Site

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*JWH*

Attachment  
Reply to Notice of Deviation  
Deviation 269, 270, 287/94-19-02  
Supplemental Information

The statement "A review of available records could not find any instances where Oconee has joined two different classes of piping by welding and intentionally inspected the weld to the requirements of the lower class except for instances where a valve has been welded in as the class break point" should be amended to say "A review of available records could not find any instances where Oconee has joined two different classes of piping by welding and intentionally inspected the weld to the requirements of the lower class except for instances; 1) where a valve has been welded in as the class break point and 2) where piping, valves and fittings 1" NPS and less is the class break point".

Duke Power acknowledges that the statements in the Oconee FSAR "Piping 1 inch and less is excluded (from Class A and B requirements)" and "Welds between classes of systems ... are performed and inspected in accordance with the rules of the higher class" are conflicting. However, great lengths were taken to assure that these statements did not conflict by stating, in the "Class III" section discussion of the FSAR that "Valves, piping, instrument fittings and thermowells with a penetration area equal to or less than a 1 inch i.d. pipe or less (all schedules) are placed in Class III regardless of system temperature or pressure, when such equipment is connected to Class I, II, or III systems..." Nevertheless, in the Deviation Response, Duke proposes to change the FSAR to clarify any conflicting statements in lieu of changing numerous weld isometric drawings for piping clearly requiring no difference in NDE requirements between classes A, B, and C piping (1" NPS and less) by all past and current Codes utilized for Oconee. Changing drawings for labelling of all of the weld joints 1" NPS and less which connect Class C piping to higher piping classifications will not increase the level of quality and safety associated with the piping sections in question.

For the welds connecting 1" NPS and less piping to piping of a higher classification, the current ASME code requirements for the inspection of such welds is clear:

- 1) According to ASME Section XI (1980 and 1989 editions), IWB 1220 (b)(1)(2), 1 inch NPS and smaller piping, components, and their connections are exempted from any volumetric and surface examination requirements.
- 2) According to the Duke Power Company Pipe Specification Manual, page 11, section 6.0, "Nondestructive Examination", the NDE "shall meet

the NDE requirements of ANSI B31.1 -1973 for piping, valves, and fittings 1 inch NPS or less."

- 3) Chapter VI of B31.1-1973 gives the examination requirements. Paragraph 136.4 titled "Examination Methods of Welds...", subparagraph 136.4.1 states "The types and extent of mandatory examinations for welds are specified in Table 136.4". Table 136.4 specifies that for branch, fillet, and socket welds in applications less than 750 degrees F the only inspection required is a "visual for all sizes and thickness".
- 4) QAL-16, Inspection of ASME Section XI Field Piping Welds, is used to identify the required inspection for QA Condition 1 welds. Table C is the table applicable to Ocone. One of the general notes to this table is "For piping and tubing 1" NPS and less (regardless of Duke Class), NDE shall be as specified in Table F". Table F requires only a visual examination for all welds less than 750 degrees F.

Therefore, Duke Power contends that no compliance or safety issues exist regarding inspection requirements for all 1 inch NPS and less piping.