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SUBJECT: Forwards request for relief 91-05 from requirements of Section XI of ASME Boiler & Pressure Vessel Code. Request proposes radiographic exam as alternative means of ensuring acceptable weld.

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**DUKE POWER**

September 11, 1991

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

Subject: Oconee Nuclear Station  
Docket Nos. 50-269  
Second Ten Year Interval  
Request for Relief No. 91-05

Pursuant to 10 CFR 50.55a, please find attached request for relief number 91-05 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 proposes radiographic examination as an alternative means of ensuring an acceptable weld.

Please approve this request by September 19, 1991.

Very truly yours,

M. S. Tuckman

Attachments

rr9104/lbj

xc: Mr. S. D. Ebnetter  
Regional Administrator, Region II

Mr. Heyward Shealy, Chief  
Bureau of Radiological Health, SC

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OCONEE NUCLEAR STATION

Second Ten Year Interval

Request #91-05

1. Component for which relief is requested:
  - (a) Name and Number: Weld Number 1-57-1-56 located on a pipe fitting between a Pressurizer Relief Valve and the Quench Tank.
  - (b) Function: Piping between a Pressurizer Relief Valve and the Quench Tank.
  - (c) ISI Class/Duke Class:       ISI Class        C  
  Duke Class     C
  - (d) IWV-2000 Valve Category: N/A
  
2. Reference Code Requirement that has been determined to be impractical: IWA-4400(a) "After repairs by welding on the system pressure retaining boundary, a system hydrostatic test shall be performed."
  
3. Basis for requesting relief: Weld 1-57-1-56 is a 4" full penetration butt weld at the 4" side of the pipe/reducer connection located down stream from the Pressurizer Relief valve 1RC-66. Hydrostatic testing would require inserting blind flanges to isolate the section of pipe containing the new weld. One of those flanges is inaccessible in that it would require cutting out a welded structural steel hanger. The removal and reinstallation would not be as ALARA efficient as the proposed alternative examination.  
  
A hydrostatic test would generate an excessive amount (approximately 500 gallons) of potentially contaminated water.
  
4. Alternate Examination: Perform a 100% radiographic test which would detect welding defects more reliably than a hydrostatic test. In addition, this line will be visually inspected during the Reactor Coolant System pressure test.

5. Acceptability of proposed alternate testing with respect to the level of quality and safety as well as public health and safety: The volumetric examination assures an acceptable weld.

Also, this piping is totally contained within the Reactor Building, thus any leakage would be contained by the Reactor Building.

The combination of the volumetric examination and the reactor building containment system provides an acceptable level of confidence that the health and safety of plant personnel and the general public will not be endangered.

6. Implementation Schedule: September 10, 1991

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