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January 11, 1983

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Attention: Ms. E. G. Adensam, Chief Licensing Branch No. 4

Re: McGuire Nuclear Station, Unit 2
Docket No. 50-370
Reque for Relief from ASME Code Section XI Requirement Determined to be Impractical

Dear Mr. Denton:

Please find attached a request for relief from hydrostatic testing requirements on the unit two main steam system piping from steam generator 2B out to valve number 2SM-5AB. This section of piping contains a relief valve (2SV-17) which was unknowingly damaged during the original hydro on the main steam system (performed per ASME Code Section III). The damage went undiscovered until after the system had been turned over to Nuclear Production. Upon discovery the valve was removed from the system, returned to the factory, and subsequently rewelded into the system.

Note that this section of the main steam system falls into the same area as that for which exemption from hydrostatic testing was requested for the feedwater nozzle modification of the Units 1 and 2 steam generators (reference my letters dated September 14 and October 19, 1982). Also attached is McGuire FSAR Fig. 10.3.2-1(1 of 3) with the corresponding Unit 1 valve highlighted, showing the valve's location in the main steam system. Although the Figure is of Unit 1, the Unit 1 and 2 systems are identical.

It is requested that this exemption be processed in a timely manner, in order to meet scheduling activities and future startup of the system. If there are any questions concerning this request, please advise.

Very truly yours,

Hal B. Tucker

PBN:jfw Attachment Bool

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cc: Mr. James P. O'Reilly, Regional Administrator
U. S. Nuclear Regulatory Commission
Region II
101 Marietta Street, Suite 3100
Atlanta, Georgia 30303

Senior Resident Inspector McGuire Nuclear Station

DUKE POWER COMPANY MCGUIRE NUCLEAR STATION

REQUEST FOR RELIEF FROM ASME CODE SECTION XI REQUIREMENT DETERMINED TO BE IMPRACTICAL

1. COMPONENT FOR WHICH RELIEF IS REQUESTED:

A. NAME AND NUMBER

Relief valve 2SV-17, which is a main steam vent to atmosphere; it has a 6" inlet and a 10" outlet. The 6" weld which attaches the valve to the (SM) main steam system is the weld for which relief from hydro is requested.

B. FUNCTION

The function of this valve is to provide venting capability of the main steam system to the atmosphere.

C. ASME SECTION III COBT CLASS

Equivalvent Class 2.

D. VALVE CATEGORY

Relief valve, ASME Code Class 2.

E. MATERIALS AND WELDS

Weld: The valve is welded to the main steam line. The weld number is SM2FW12-22, and the joint thickness is 1.5 inches.

Material: Pipe on valve is SA-106 grade C, 1.5" wall thickness, 6" I.D., 9" O.D.

Main steam line run pipe is SA-106 Grade C, 34" 0.D., 1.250 vall thickness.

2. ASME CODE SECTION XI REQUIREMENT THAT HAS BEEN DETERMINED TO BE IMPRACTICAL ASME B and PV code section XI, 1977 edition through summer 1978 addenda, article IWA-4400, IWC-5000.

3. BASIS FOR REQUESTING RELIEF

Performing a hydrostatic test on the main steam piping and relief valve

2SV-17 would be impractical, extr sely difficult, and very costly, due to the following reasons:

- A. Result in additional steam generator hydro cycle.
- B. Additional time required to gag safety relief valves, and potential damage to said valves.
- C. Additional time required to pin or block main steam constant support hangers.
- D. Potential damage due to static load on main steam system caused by water solid condition.
- E. Potential damage to steam generator tube bundle.
- F. Potential leakage through main steam isolation valves, feedwater isolation valves, and other valves in the system (inability to hold pressure).
- G. Potential damage to instrumentation, or considerable delay due to isolation/removal of instrumentation.

In addition to these reasons, the alternate examinations specified in item 4 below are equal to or better than the required testing per the code.

4. ALTERNATE EXAMINATION

A 100% radiographic examination of the pressure boundary weld has been made and accepted. In addition, U.T. examination will be performed in accordance with ASME Section V, article 5, and also a weld surface examination by PT. Although the geometry in the area to be examined presents difficulties for a U.T. examination, it will be performed on a "best effort" basis. Also, an inservice leak test at system pressure and temperature will be performed at the earliest possible time, along with a hydro test to be performed at the 10-year inspection interval per section XI of the ASME code.

5. IMPLEMENTATION

These examinations have already been done, or will be done, prior to commercial operation of the unit, with the exception of the 10-year hydrotest.

