



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

REQUEST FOR RELIEF FROM INSERVICE INSPECTION REQUIREMENTS

RELATED TO SAFETY-RELATED SNUBBERS

SECOND TEN-YEAR INTERVAL, MCGUIRE NUCLEAR STATION, UNIT 2

DOCKET NO. 50-370

1.0 INTRODUCTION

By letter dated April 14, 1994 (Reference 1), the Duke Power Company (DPC or licensee), pursuant to 10 CFR 50.55a(g)(5)(iii), requested relief from the requirements of the 1986 Edition of the ASME Boiler and Pressure Vessel Code, Section XI, Article IWF-5000 (hereafter referred to as the Code) for the McGuire Nuclear Station, Unit 2.

The McGuire Technical Specification (TS) Surveillance Requirement 4.7.8 states that each snubber required by TS 3.7.8 be operable by performing an augmented inservice inspection program (as specified by TS 4.7.8a-i). Part of this augmented inspection program (TS 4.7.8e) requires that during the first refueling shutdown, and at least once per refueling outage, a representative sample of snubbers be tested using one of three stated sample plans. In addition, TS 4.0.5 requires that the ASME Code Section XI be followed in accordance with 10 CFR 50.55a(g).

In the attachment to Reference 1, the licensee stated that safety-related snubbers will be functionally tested in accordance with plan 2) of the three alternative plans in TS 4.7.8e. Plan 2) for snubber selection differs from the plan in Section XI of the Code. The Code provides for only one sampling plan, which is identical to plan 1) of TS 4.7.8e. Since it seemed redundant to comply with both the Code and the TS sampling plans for the snubber tests, the licensee submitted the relief request.

By letters dated March 26, 1985 (Reference 2) and October 29, 1993 (Reference 3), respectively, the staff approved similar requests by the licensee for relief from the ASME Section XI requirements during the first ten-year interval for both McGuire Unit 1 and Unit 2, and during the second ten-year interval for McGuire Unit 1. The present request involves the safety-related snubbers selection plan to be performed during the second ten-year interval for inservice inspection at McGuire, Unit 2.

2.0 EVALUATION

For snubber inservice functional tests, the McGuire TS provides three NRC-approved sampling plans, one of which (plan 1) of TS 4.7.8e) is identical to that required by the ASME Code Section XI (Reference 4).

The other two plans were developed on the basis of operating experience, design practice, and statistical studies to permit the licensee flexibility in selecting an alternate sampling plan from the TS.

Performance of any of these three plans will provide a confidence level greater than 95% that at least 90% of the snubbers will be operable within acceptable limits. Therefore, TS 4.7.8e requires only one of three stated sample plans to be performed for inservice functional tests of snubbers. More than one sampling plan will be unnecessary and excessive.

Therefore, we find that the performance of the Code sampling plan requirements will be redundant to the performance of TS 4.7.8e.2) since the use of any of the three sampling plans from the McGuire TS is sufficient to ascertain the functionality of safety-related snubbers during normal plant operation and will provide an acceptable level of quality and safety.

### 3.0 CONCLUSION

Based on our evaluation in Section 2.0, we conclude that compliance with the sampling plan in the McGuire TS 4.7.8e.2) will provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), we conclude that the licensee's request for relief from the Code sampling plan requirements during the second ten-year interval for McGuire, Unit 2, should be granted. This relief is authorized by law and there is reasonable assurance that the activities authorized by this relief can be conducted without endangering the health and safety of the public.

### REFERENCES

1. Duke Power Company letter to NRC dated April 14, 1994.
2. NRC letter to Duke Power Company dated March 26, 1985.
3. NRC letter to Duke Power Company dated October 29, 1993.
4. ASME Boiler and Pressure Vessel Code Section XI, 1986 Edition, Article IWF-5000.

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