



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUEST FOR SNUBBER INSERVICE INSPECTION PROGRAM

DUKE POWER COMPANY

MCGUIRE NUCLEAR STATION UNITS 1 AND 2

DOCKET NOS. 50-369 AND 50-370

1.0 INTRODUCTION

In letters dated May 30 and March 20, 1995, Duke Power Company (DPC), the licensee of McGuire Nuclear Station, Units 1 and 2 (McGuire 1 and 2), requested relief from the requirements of ASME Code, Section XI, 1989 Edition for the Second Ten-Year Inservice Inspection (ISI) Program for visual examinations of snubbers, pursuant to 10 CFR 50.55a(g)(5)(iii).

In another letter dated May 30, 1995, DPC stated that the McGuire Unit 1 ISI Program had been updated, on February 27, 1995, from the 1986 Edition of the ASME Code, Section XI to the 1989 Edition. This Code update will take effect with the start of the second period of the second interval of the ISI Program, which includes refueling outages 10 through 14. The first period of the second interval of the ISI Program was conducted to the 1986 Edition, which included refueling outages 8 and 9. McGuire Unit 2 ISI Program has been performed to the requirements of ASME Code, 1989 Edition since the beginning of its power operation.

Currently, the McGuire Units 1 and 2 ISI program for snubbers is, therefore, required to be performed in accordance with the ASME Code, Section XI, Article IWF-5000, in accordance with the first addenda to ASME/ANSI OM-1987 Edition, Part 4 (OM Part 4), using the VT-3 visual examination method described in IWA-2213. The licensee stated that the alternative use of the visual examination program on Code Class 1, 2, and 3 snubbers, in accordance with McGuire Technical Specifications (TS), would provide an acceptable level of quality and safety.

2.0 EVALUATION

McGuire Units 1 and 2 have 346 and 359 snubbers, respectively, which are subject to the inservice inspection in accordance with IWF-5000. The plant is currently on a fuel cycle length of approximately 18 months. In order to comply with the current ASME requirements of IWF-5000, DPC would be required to perform VT-3 visual examinations on all snubbers within the ISI program at every refueling outage. This examination frequency is twice that presently required by Technical Specification (TS) 3/4.7.8.

TS 3/4.7.8 has an examination frequency for snubbers not to exceed 48 months, which may vary depending on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories.

The examination interval requirements in the McGuire TS are based on NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions." Prior to the incorporation of GL 90-09 into the TS, the examination interval in the TS was identical to that in the above OM Part 4. GL 90-09 acknowledged that licensees having a large number of snubbers find that the 18-month visual examination schedule in OM Part 4 to be excessively restrictive and that some licensees have spent a significant amount of resources and have subjected plant personnel to unnecessary radiological exposure to comply with the visual examination requirements without increasing the confidence level in snubber operability.

As an alternative to the requirements of ASME Section XI, IWF-5000, which invokes the examination frequency of OM Part 4, the licensee therefore, requested that VT-3 visual examination of snubbers, within the Section XI ISI boundaries, be performed on a schedule as provided by TS 3/4.7.8. (Note that the snubbers within the ISI boundaries shall be considered part of the total population of snubbers inspected under TS 3/4.7.8.)

The staff has reviewed the licensee's submittals and finds that the TS requirements of snubber visual examination as proposed by DPC meet the intent of OM-1987, Part 4. The staff, therefore, finds that TS 3/4.7.8 provides an acceptable alternative for visual examination of Code Class 1, 2, and 3 snubbers for McGuire Units 1 and 2 in that it will provide an acceptable level of quality and safety.

CONCLUSION

Based on the above evaluation, the staff has determined that the proposed alternative use of the TS for the Code Class snubbers in lieu of the requirements of ASME Code 1989 Edition, Section XI, Article IWF-5000 (which references OM-1987, Part 4), with regard to visual examination of Code Class 1, 2, and 3 snubbers, would provide an acceptable level of quality and safety. Therefore, the alternative is authorized, pursuant to 10 CFR 50.55a(a)(3)(i).

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