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McGuire Nuclear Generation Department
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DUKE POWER

July 8, 1992

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

Subject: McGuire Nuclear Station, Units 1 and 2
Docket Nos. 50-369 and 50-370
Pump and Valve Inservice Testing (IST) program
Relief Request 92-01

Dear Sir;

Pursuant to 10 CFR 50.55(g)(5)(iii), I am submitting the attached relief request for NRC review and approval. This request for relief from ASME Code involves the recording of stroke test data requirements for category A and B valves. The valves in question are located on the control air headers for the diesel generators.

The valves were not initially identified as being within the scope of our IST program as defined by IWV-1100. During our Design Basis Document upgrade program, these valves were identified as meeting the scope requirements of IWV-1100 and thus, should have been included in our IST program. As discussed in the attached, relief from the ASME Code requirements is requested since these valves will be removed during a planned modification and due to the burden associated with complying with all code requirements for this short period of time. Your timely review and approval of this submittal is requested.

Should there be any questions regarding this matter, please contact Paul Gull at (704) 875-4002.

Very truly yours,

Ted C. McMeekin

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U. S. Nuclear Regulatory Commission
July 8, 1992
page 2

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S. D. Ebnetter

Regional Administrator, Region II

P. K. Van Doorn

Senior Resident Inspector, McGuire

T. A. Reed, Project Manager

ONRR

John C. Brooks, Commissioner of Labor

Attention: Director, Boiler & Pressure Vessel Division

Department of Labor State of North Carolina

4 West Edenton Street

Raleigh, North Carolina 27601

ATTACHMENT

DUKE POWER COMPANY
MCGUIRE NUCLEAR STATION

Request for Relief From ASME Code Section XI Requirements

I. Component for Which Relief is Requested

- A. Name and Identification Number
1,2VGSV5160; 1,2VGSV5161; 1,2VGSV5162; 1,2VGSV5163;
1,2VGSV5170; 1,2VGSV5171; 1,2VGSV5172; 1,2VGSV5173
- B. Function
These valves are located on the control air headers of the diesels. Upon a diesel start signal, these solenoid valves are energized to direct dried, filtered control air to the air/oil booster cylinder, the intercooler temperature controller, and the run/shutdown cylinder (which allows fuel to the engine). When the engine reaches 95% speed, solenoid valves 1,2VGSV5160; 5161; 5170; and 5171 are de-energized, thereby venting the air supplied to the air/oil booster cylinder and the shuttle valve to atmosphere. See Attached instrument detail schematic (DWG. NO. MC-1499-VG3).
- C. ASME Section XI Code Class
Class C
- D. Valve Category
Category B

II. ASME Code Section XI Requirement That Has Been Determined To Be Impractical

ASME Code Section XI, 1980 Edition through Winter 1980 addenda, Article IWV-3413(b) and IWV-3414 for measuring the stroke times and the recording of the data.

III. Basis for Requesting Relief

Since the valves in question are solenoid valves, direct observation of valve disk movement is not practical. Further, due to limitations of available acoustic emission monitoring equipment, this means of verifying disk movement is not readily available at this time. Furthermore, during the upcoming refueling outages for both units (EOC-8 refueling outages), the valves in question will be modified such that they would not fall within the scope of IWV-1100. As such, no adverse trends can be developed from the quarterly full stroke exercise test.

In addition, a diesel start test is performed every month. If any one of these valves fail to perform its intended function, it would result in a failure of the diesel to start. Conversely, if the diesel does successfully start, this would indicate that the valves in question performed their intended safety function. By this indirect means, the proper performance of the valves are verified on at least a monthly basis.

Accordingly, since there is no short term practical way of monitoring the valve disk movement; that in the near future the valves will be modified in such a manner that they no longer fall within the our IST program; and that the operation of the valves are verified (indirectly) via the monthly diesel start test, relief from the timing requirements of IWV-3413(b) and the recording requirements of IWV-3414 is requested.

IV. Alternate Testing

As stated above the valves are indirectly tested during the monthly diesel start test. Any failures of one of the valves in question would result in the diesel failing to start.

V. Implementation Schedule

The monthly diesel start test will continue to be performed and during the EOC-8 refueling outages for both units, the function of these valves will be modified such that they are no longer subject to the requirements of IWV-3400. The EOC-8 refueling outage for unit 1 is scheduled to begin in March, 1993 and for unit 2 to begin June 1993.

