

**DUKE POWER COMPANY**

P.O. BOX 33189  
CHARLOTTE, N.C. 28242

HAL B. TUCKER  
VICE PRESIDENT  
NUCLEAR PRODUCTION

November 5, 1984

TELEPHONE  
(704) 373-1531

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

Subject: McGuire Nuclear Station  
Docket Nos. 50-369, -370

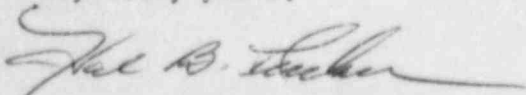
Dear Mr. Denton:

During the licensing process of McGuire, an Augmented Inservice Inspection for Pipe Rupture Protection was proposed by Duke and approved by NRC. The staff evaluation and conclusions are contained in NUREG-0422, Supplement 4, dated January 1981 (the McGuire Safety Evaluation Report). The purpose of this letter is to identify an alternate inservice inspection plan for the Accumulator Injection Line welds. No other portions of the previously committed to Augmented ISI plan are affected.

The Duke Augmented Inservice Inspection for Pipe Rupture Protection is contained in Duke report SRG-78-01, as revised. As stated therein, "inservice inspection is a viable alternative to protect against postulated pipe ruptures in very ductile material". One of the major features of this inspection was to be examined while the system is under pressure. The examination program was detailed in Appendix III of SRG-78-01 and for the Accumulator Injection Line welds, the examination conditions proposed were 450 psig system pressure and 150°F system temperature. For the reasons contained in the attached, Duke Power has determined that examination under these conditions of temperature and pressure to be impractical. The bases of this determination is provided as well as our intended alternative examination. Duke considers that the planned alternate examination is technically superior to an examination while the system is under pressure, as previously proposed. Duke intends to implement this new examination technique during a forthcoming Unit 1 planned maintenance outage during November - December 1984.

Duke considers that this action is a change to a previous Duke commitment. Unless informed to the contrary, Duke considers that the actions as described in the attached are acceptable and no further actions on the part of the NRC are necessary.

Very truly yours,



Hal B. Tucker

RLG/mjf

Attachment

8411080300 841105  
PDR ADOCK 05000369  
Q PDR

A047  
1/1

Mr. Harold R. Denton, Director  
November 5, 1984  
Page Two

cc: Mr. James P. O'Reilly, Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region II  
101 Marietta Street, NW, Suite 2900  
Atlanta, Georgia 30323

Mr. W. T. Orders  
NRC Resident Inspector  
McGuire Nuclear Station

Mr. Ralph Birkel  
Division of Project Management  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Duke Power Company  
McGuire Nuclear Station  
Augmented Inservice Inspection  
Accumulator Injection Line Welds

The Accumulator Injection Lines are connected to each reactor coolant system cold leg as indicated on the attached drawings. The welds of concern are located at the elbow between the NI isolation valve (NI-60, NI-71, NI-82, and NI-84) and the respective cold leg (A, B, C, D).

The inspection commitment as described in Duke document SRG-78-01, provides for volumetric and surface examinations with the system at 450 psig and 150°F. In order to satisfy the pressure-temperature limits of the reactor coolant system, to which the accumulator line is directly connected, the fluid temperature would need to be at least 180°F.

Duke has reviewed this commitment and determined that examination performed under the temperature - pressure limitations would be less reliable and rather than "enhance detection" may in fact degrade overall examination reliability. Inspections performed at the elevated temperatures are inherently less reliable than those performed under normal ambient temperatures due to heat stress on the operator. Furthermore, these welds are located in the very restricted lower containment area. Radiation exposures would increase as the examiner would spend more time applying penetrant for the PT as it dries out due to higher temperature. Similarly more time would be needed for UT due to the higher temperature.

In conclusion, Duke intends to perform PT and UT examinations with the accumulator injection system depressurized. By using modern inspection techniques developed in recent years for detection of intergranular stress corrosion cracking, adequate assurance of weld integrity can be obtained with this system depressurized.

