# DUKE POWER COMPANY

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May 5, 1988

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

Subject: McGuire Nuclear Station, Unit 1

Docket No. 50-369

ASME Code Section XI Requirements

Relief Request No. 88-04

Gentlemen:

Pursuant to 10CFR 50.55a(g)(5)(iii), find attached the subject request for relief from ASME Code Section XI Requirements pertaining to McGuire Nuclear Station's Nuclear Service Water system piping.

Pursuant to 10CFR 170.3(y), 170.12(c), and 170.21 find enclosed an application fee of \$150.00.

Should there be any questions concerning this matter, please contact S.E. LeRoy at (704)373-6233.

Very truly yours,

Hal B. Tucker

SEL/10/sbn

Attachment

xc: Dr. J. Nelson Grace Regional Administrator, Region II U.S. Nuclear Regulatory Commission 101 Marietta St., NW, Suite 2900 Atlanta, GA 30323

> Mr. Darl Hood U.S. Nuclear Regulatory Commission Office of Nuclear Reactor Regulation Washington, D.C. 20555

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

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#### DUKE POWER COMPANY

#### McGUIRE NUCLEAR STATION RELIEF REQUEST NO. 88-04

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

#### 1. Component For Which Relief Is Requested:

#### A. Name and Number:

McGuire Nuclear Station modification MG-12135 Rev. 0 will add a 6" inspection port on the side of Containment Spray Heat Exchanger 1A. The 6" inspection port as shown on the attached drawing requires a reinforcing collar to maintain pressure vessel strength. This connection is considered an alteration (as compared to a repair) to the pressure vessel per the National Board Inspection Code Book. The hydrostatic pressure testing requirement for a pressure vessel alteration is pressurizing the entire heat exchanger to 110% of its design pressure or 220 psig. Pressurizing the entire heat exchanger is impractical; therefore, relief is requested for this method of pressure testing.

#### B. Function:

The NS system is an Engineered Safety Feature which serves to remove thermal energy from the Containment Building in the event of a loss-of-coolant-accident. The NS Heat Exchanger is of the shell and tube type with the tubes welded to the tube sheet. Borated water from either the Refueling Water Storage Tank or the lower compartment of the Containment Building circulates through the tubes while Nuclear Service Water (RN) circulates through the shell side. The NS Heat Exchanger is designed to assure adequate heat removal capacity from the water during the recirculation mode. The 6" inspection port will be used to help analyze fouling build up on the heat exchanger tubes for cleaning purposes.

#### C. ASME III Code Class:

Equivalent Class 3

#### D. Materials and Welds

Weld RN1FW 115-27 is a 3/8" fillet weld. Welds RN1FW115-24 and RN1FW115-26 are 3/16" double-bevel-groove welds with a fillet weld on top. RN1FW115-25 is a V-groove weld with a convex contour. The reinforcing pad is 1/2" x 11" OD SA-516 grade 70. The pipe material is 6" OD, schedule 40, SA 106 grade B, and the flange is 150 lb. raised face, weld neck, SA105 with a 150 lb., SA-105 blind flange, (See attached).

# 2. ASME Code Section XI Requirement That Has Been Determined To Be Impractical:

ASME Boiler and Pressure Vessel Section XI, 1980 Edition through Winter 1980 addenda, Article IWA-4400, IWD-5000.

# Basis For Requesting Relief:

Hydrostatic testing of welds referenced in Section 1 of this request would be impractical based on the following reason:

The inlet and outlet isolation valves are 18" valves and are a butterfly type design. Historically, these butterfly valves have not held design hydro pressures without significant leakage. It is believed that additional hydro pump capacity would not result in the desired pressure due to leakage past these valves. The installation of blind flanges upstream and downstream of the outlet isolation valves would require complete drain down of the RN Supply and Return Header. This task could not be accomplished within the 72 hour Technical Specification limit. The RN system is a low pressure, low temperature (135 psig, 95° F) system, while the heat exchanger vessel is designed for 200 psig. Therefore, the hydrostatic pressure would be limited to 1.1 times 135 psig or 149 psig due to limiting RN system design parameters.

## 4. Alternative Testing:

- A. A pneumatic test will be performed on the subject welds, prior to drilling a hole in the vessel, at 110% of 200 psig or 220 psig to assure weld integrity, (See attached).
- B. An In-Service-Inspection (ISI) at system pressure will be performed following the return of the vessel to service.

# 5. Why The Alternate Proposed Testing Will Provide An Acceptable Level Of Quality And Safety:

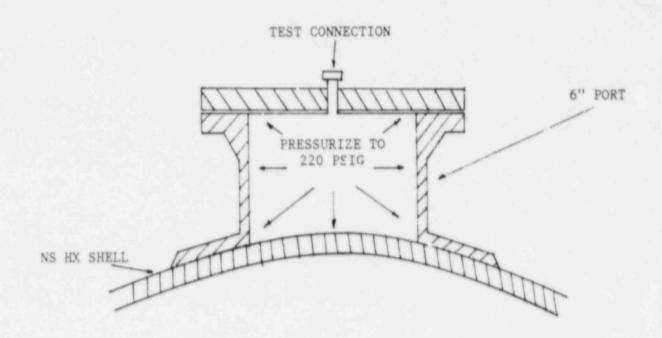
A. The hydrostatic pressure would be limited to 149 psig based on RN system design parameters. The proposed pneumatic pressure test will be accomplished by pressurizing the inspection nozzle port to 220 psig before the heat exchanger vessel is penetrated. This proposed alternative to the code requirement along with the previously mentioned ISI will provide an acceptable level of quality and safety.

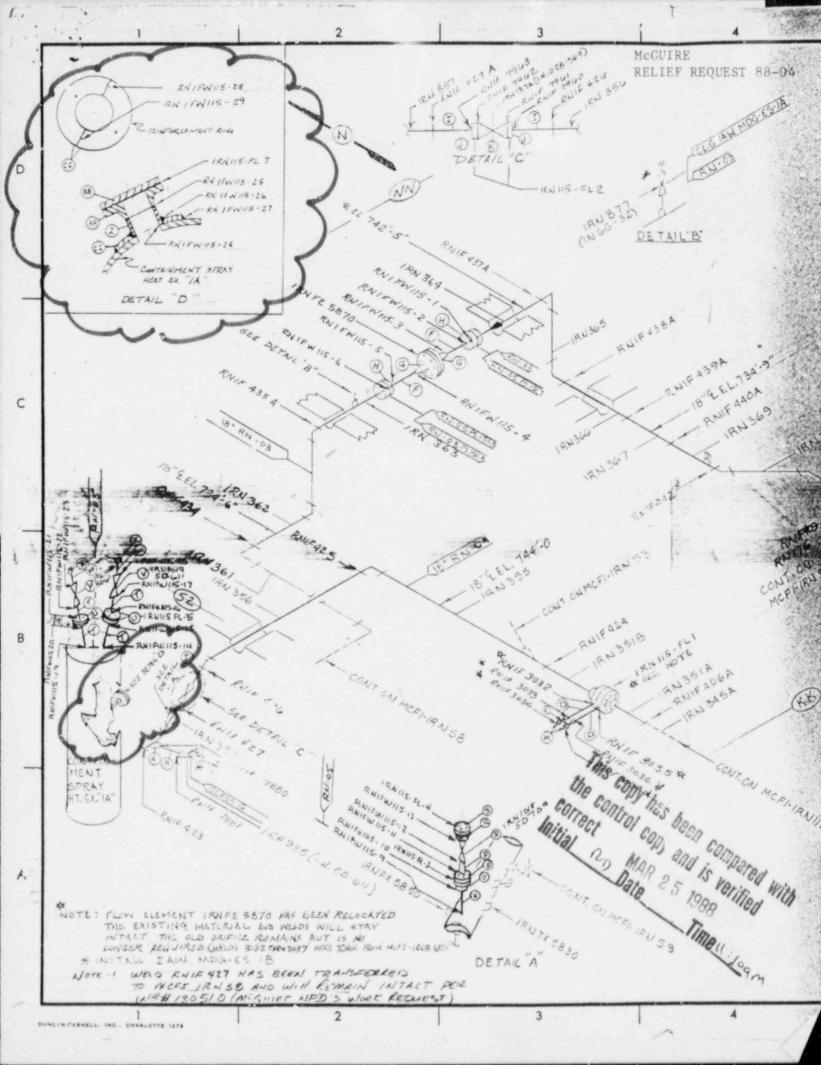
## 6. Implementation:

The installation of the inspection nozzle was scheduled for March 29, 1988, and was completed on April 1, 1988.

# DUKE POWER COMPANY McGUIRE NUCLEAR STATION ATTACHMENT TO RELIEF REQUEST NO. 88-04

The alternative testing described in Section 4-A of the relief request will be accomplished by pressurizing the 6" port via a test connection as shown in the drawing, prior to the heat exchanger shell being penetrated.





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