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March 6, 2000

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555-0001

SUBJECT: Duke Energy Corporation
Oconee Nuclear Station Unit 3
Docket No. 50-287
Request to use an Alternative to the ASME Boiler
and Pressure Vessel Code, Section XI in accordance
with 10CFR50.55a(a)(3)(i).
Duke Energy Corporation Serial No. 00-002, Rev 1

By letter dated February 24, 2000, Duke Energy Corporation requested the use of an alternative to the requirements of the ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL, 1992 Edition with the 1992 Addenda for Oconee Unit 3, pursuant to 10CFR50.55a(a)(3)(i). As a result of discussions with the NRC, it was determined that additional clarification would aid the NRC in evaluating the proposed alternative. The proposed alternative has been amended to provide clarification that the alternative is to be used only for the Unit 3 25-year concrete and post-tensioning system examinations. The amended alternative and justification is included as an enclosure to this letter.

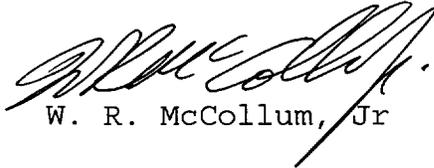
Duke requests NRC approval of this request for alternative by March 31, 2000, i.e., two weeks prior to the scheduled start of Unit 3 refueling outage EOC18.

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Questions regarding this request may be directed to M. J.
Ferlisi at (704) 382-3923.

Very truly yours,



W. R. McCollum, Jr

Attachment:
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Request for Alternative

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xc w/att: L. A. Reyes, Regional Administrator
U.S. Nuclear Regulatory Commission, Region II
Atlanta Federal Center
61 Forsyth St., SWW, Suite 23T85
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D. E. LaBarge, Senior Project Manager, Section 1
Project Directorate II
Division of Licensing Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
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M. E. Shannon, NRC Senior Resident Inspector (ONS)

DUKE ENERGY CORPORATION
Request For Alternative
Oconee Nuclear Station Unit 3

Applicable Code Edition and Addenda

ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWL, 1992 Edition with the 1992 Addenda.

Description of Code Requirement(s) for Which an Alternative is Requested

IWL-2410(c) requires that concrete examinations shall commence not more than 1 year prior to, and shall be completed not more than 1 year after, the dates specified in IWL-2410(a).

IWL-2420(c) requires that unbonded post-tensioning system examinations shall commence not more than 1 year prior to, and shall be completed not more than 1 year after, the dates specified in IWL-2420(a).

Description of Proposed Alternative

In lieu of the requirements of IWL-2410(c) and IWL-2420(c), Duke Energy Corporation proposes the following one-time alternative for Oconee Unit 3:

The 25 year examinations shall commence not more than 1 year prior to the specified dates and shall be completed not more than 15 months after such dates.

Justification for Using the Proposed Alternative

The Unit 3 Structural Integrity Test was completed on May, 7, 1974. As a result, the 25 year concrete and unbonded post-tensioning system examinations performed in accordance with

Subsection IWL must be performed between May 7, 1998 and May 7, 2000.

As a result of operating cycle changes, Unit 3 refueling outage EOC18 is not currently scheduled to end until late in May, 2000, beyond the May 7, 2000 deadline. The proposed alternative is requested to allow for a reasonable period in which to complete the expedited examinations required by 10CFR50.55a(g) (6) (ii) (B) (2).

The previous examinations of the Unit 3 unbonded post-tensioning system were completed on July 20, 1995 in accordance with the Ocone Technical Specifications applicable at the time. The approved Technical Specification schedule for these examinations varied from that specified in the ASME Code, Section XI, Subsection IWL, 1992 Edition with the 1992 Addenda.

The proposed alternative will require the next concrete and unbonded post-tensioning system examinations to be performed in accordance with Subsection IWL no later than August 7, 2000.

The schedule for subsequent concrete and unbonded post-tensioning system examinations for Unit 3 shall comply with IWL-2410(c) and IWL-2420(c), with examinations being performed at 5/7/2004 (+/- 1 year) and every 5 years thereafter.

For examinations starting with those 10 years after the completion of the Structural Integrity Test, examinations are required to be performed every five years (+/- 12 months). If the +/- 12 month tolerances of IWL-2410(c) and IWL-2420(c) are used, more than 5 years may elapse between consecutive examinations. The proposed alternative will require concrete and unbonded post-tensioning system examinations performed on Unit 3 in 2000 to be completed within 61 months of the examinations completed in 1995.

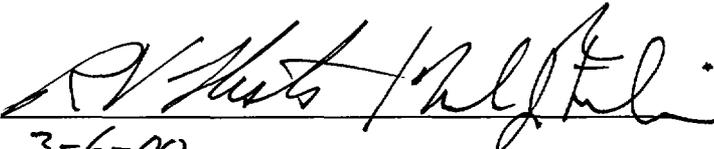
The Quality and Safety Provided by the Proposed Alternative

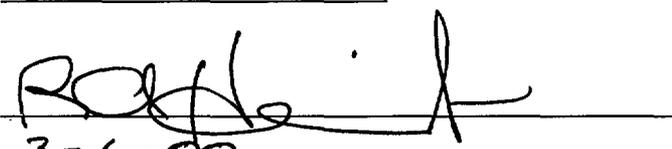
IWL examinations are scheduled at periodic intervals to allow for timely detection of potential damage or degradation that could affect the integrity of the primary containment structure. Use of this alternative will provide an acceptable level of quality

and safety because the proposed examination schedule results in examinations being performed well within the +/- 12 month tolerances permitted by Subsection IWL. As such, the proposed alternative will allow potential damage or degradation to be detected earlier than if examinations were conducted in accordance with IWL-2410(c) and IWL-2420(c).

Duration of the Proposed Alternative

The proposed alternative is requested only for the Unit 3 25-year concrete and unbonded post-tensioning system examinations performed in accordance with Subsection IWL prior to August 8, 2000.

Originated By: 
Date: 3-6-00

Approved By: 
Date: 3-6-00