

October 20, 2000

Mr. Oliver D. Kingsley, President  
Nuclear Generation Group  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: DRESDEN, UNIT 2 - SAFETY EVALUATION OF DEFERRAL OF WELD  
OVERLAYS (TAC NO. MA6243)

Dear Mr. Kingsley:

By letter dated August 6, 1999, Commonwealth Edison Company (ComEd, the licensee) notified the NRC staff of its plans to defer inspection on thirty-six (36) of thirty-eight (38) weld overlays at the Dresden Nuclear Power Station, Unit 2. ComEd proposed to defer these inspections in accordance with the guidance presented in a letter dated June 17, 1999, from Jack R. Strosnider, NRC, to Carl Terry, Boiling Water Reactor Vessel and Internals Project (BWRVIP) Chairman.

The staff's June 17, 1999, letter was in response to the BWRVIP letter dated May 13, 1999, which requested that the NRC staff "...allow the BWR plants Dresden Unit 2, Duane Arnold, Vermont Yankee, Brunswick Units 1 and 2, FitzPatrick, Hatch Unit 1, Hope Creek, Peach Bottom Unit 2, and Quad Cities Units 1 and 2, to defer weld overlay examinations until March 2001, or until the completion of the NRC staff review and approval of the proposed generic report ["Technical Basis for Revisions to Generic Letter (GL) 88-01 Inspection Schedules (BWRVIP-75)," Electric Power Research Institute (EPRI) Proprietary Report TR-113932, dated October 27, 1999], whichever comes first."

Presently, under the requirements of GL 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," dated January 25, 1988, licensees shall have an inservice inspection (ISI) program for austenitic stainless steel piping, as covered under the scope of GL 88-01, that conforms to the staff positions on inspection schedules, methods and personnel, and sample expansion delineated in GL 88-01. NUREG-0313, Revision 2, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," dated January 1988, details the technical bases for the positions presented in GL 88-01.

The BWRVIP proposed the following criteria that must be met in order to defer these inspections:

1. The plant is operated in compliance with the EPRI water chemistry guidelines,

2. The overlay for which deferral is applied meets GL 88-01 or the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Case N-504 (full structural overlay) as opposed to a temporary duty (leakage barrier) overlay, and
3. The overlays for which the deferral is applied must have been inspected at least two times without intergranular stress corrosion cracking (IGSCC) indications in the overlay. The two examinations include a baseline examination after overlay application and one examination that was completed after the overlay has been in service for at least one full fuel cycle.

The NRC staff has reviewed these criteria and finds them acceptable justification for deferral of weld overlay inspections, as required by GL 88-01 and NUREG-0313, Revision 2, for the subject BWR plants.

The Dresden Technical Specification (TS) Section 4.0, "Surveillance Requirements," Paragraph E.6, states that "the Inservice Inspection Program for piping identified in GL 88-01 shall be performed in accordance with the staff positions on schedule, methods, and personnel and sample expansion included in GL 88-01 or in accordance with alternate measures approved by the NRC staff." Therefore, no TS change will be required for this proposed deferral.

In its August 6, 1999, letter, ComEd stated it had determined that the thirty-six (36) welds for which it is deferring inspection, have met the above three criteria. Specifically, ComEd stated that:

- a. Dresden Station has been in compliance with EPRI's Water Chemistry Guidelines since October of 1984 when ComEd Corporate Procedure NOD-CY.2, "BWR Water Chemistry Control Program," was approved. NOD-CY.2 incorporates the EPRI Water Chemistry Guidelines for use at all ComEd BWR units. The actions taken for exceeding Action Level One for reactor coolant in NOD-CY.02 are more restrictive than those in the EPRI BWR Water Chemistry Guidelines.
- b. A review of all existing weld overlay repairs was performed and confirmed that all thirty-eight weld overlays on Dresden Unit 2 meet either the structural (thirty-seven) or the design (one) criteria in Generic Letter 88-01/NUREG-0313 Revision 2. All thirty-eight weld overlays on Dresden Unit 2 also meet ASME Code Case N-504, except a VT-3 examination was not performed after completion of all repair activities as specified in (k) of the Code Case. During the design of all weld overlays, the effects of shrinkage on the system were considered and no further evaluation was required. Dresden Station has no temporary duty (leakage barrier) overlays.

Since the licensee's August 6, 1999, letter states that the thirty-six (36) welds identified in the attachment, "Weld Overlay Summary," have been inspected at least once after the overlay was applied, and at least once in an inservice inspection following one full fuel cycle, these welds meet the above Criteria 3. Since the licensee has met the above criteria, the staff finds that the licensee may defer inspection of the subject weld overlays until March 2001 or until the completion of the NRC staff review and approval of the BWRVIP-75 report, whichever comes first.

The staff's review of the BWRVIP-75 report is documented in a safety evaluation (SE) enclosed with a letter dated September 15, 2000, from Jack R. Strosnider, NRC, to Carl Terry, BWRVIP Chairman. The NRC staff has found, as stated in that SE, that, with the exception of the open items discussed in the SE, the BWRVIP-75 guidance is acceptable for a licensee to reference as the technical basis for relief from, or as an alternative to, the ASME Code and 10 CFR 50.55a, in order to use the sample schedules and frequencies specified in the BWRVIP-75 report that are less than those required by the ASME Code.

This completes the staff's effort for TAC No. MA6243.

Sincerely,

*/RA/*

Lawrence W. Rossbach, Project Manager, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-237

cc: See next page

The staff's review of the BWRVIP-75 report is documented in a safety evaluation (SE) enclosed with a letter dated September 15, 2000, from Jack R. Strosnider, NRC, to Carl Terry, BWRVIP Chairman. The NRC staff has found, as stated in that SE, that, with the exception of the open items discussed in the SE, the BWRVIP-75 guidance is acceptable for a licensee to reference as the technical basis for relief from, or as an alternative to, the ASME Code and 10 CFR 50.55a, in order to use the sample schedules and frequencies specified in the BWRVIP-75 report that are less than those required by the ASME Code.

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\*Concurrence provided by memo dated 11/30/99, no significant changes made  
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