



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 15, 1995

Mr. George A. Hunger, Jr.
Director-Licensing, MC 62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: REACTOR WATER CLEANUP (RWCU) SYSTEM WELD INSPECTIONS AT PEACH BOTTOM
ATOMIC POWER STATION, UNITS 2 AND 3 (TAC NOS. M92442 AND M92443)

Dear Mr. Hunger:

By letter dated May 24, 1995, PECO Energy Company requested approval of a proposal to eliminate certain weld inspection commitments made in response to Generic Letter 88-01, Supplement 1, "NRC Position on Intergranular Stress Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping." In the May 24, 1995 letter PECO proposed to eliminate inspections of welds on the RWCU system outboard of the primary containment isolation valve. PECO had previously committed (letter from G. Beck, PECO, to NRC, dated August 17, 1992) to inspect ten percent of the IGSCC susceptible welds on the RWCU system on a sampling basis during each refueling outage.

In the May 24, 1995 letter, PECO provided information to justify elimination of this commitment. PECO stated that:

- (1) Inspection of the RWCU welds outside of primary containment had been conducted during recent refueling outages on Peach Bottom Unit 2 and Unit 3. The inspections had examined a total of twenty-three welds on Unit 2 and ten welds on Unit 3. During those inspections, no IGSCC was detected,
- (2) Inspections of safety-related RWCU system welds inside primary containment isolation boundaries during recent refueling outages had turned up one instance of IGSCC on each unit. In both instances, the cracking occurred at the inlet side of check valve 2(3)-12-62. This valve had been relocated since initial construction and PECO stated that excessive cold working during the relocation was believed to be a contributing cause. Each crack has been repaired with a weld overlay,
- (3) Water chemistry had improved significantly in recent years, and
- (4) The RWCU system piping outside of primary containment has automatic isolation valves which can be used to isolate an RWCU system break outside of primary containment.

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The staff has adopted a position that licensees may reduce their commitments to the ten percent RWCW weld inspection sample basis provided three certain criteria are met. For plants not meeting all of the criteria, a licensee may reduce its inspection sample size to two percent per refueling outage provided some of the criteria are met. The staff's commitment reduction criteria are included in the enclosure.

The staff reviewed PECO's proposal and determined that Peach Bottom Units 2 and 3 do not meet all of the criteria for a complete elimination of RWCW weld inspections. Specifically, PECO has detected IGSCC on certain welds inboard of primary containment isolation valves. Thus, based on the criteria in the enclosure, PECO may reduce the size of the weld inspection sample size from ten percent of the susceptible welds down to two percent of the susceptible welds each outage.

In approving this commitment reduction, the staff notes that PECO has not completed all planned activities in its motor operated valve (MOV) program which it developed pursuant to Generic Letter 89-10. The staff notes PECO has completed the GL 89-10 program for Unit 2 and has committed to completing the GL 89-10 program for Unit 3 during refueling outage 3R010 which is scheduled to start September 20, 1995. Because the Unit 3 GL 89-10 program remains to be completed, the staff requested specific information regarding the status of Unit 3 RWCW MOVs during the review of the May 24, 1995 proposal. The licensee provided the requested information concerning MOV valve factors, torque switch settings and weak link analyses in letters dated August 9 and August 16, 1995. The staff reviewed the licensee's information and found it acceptable for concluding that both Peach Bottom units met criteria (1) of the enclosed criteria.

The staff has concluded that PECO may implement a two percent sample program for RWCW welds outside of primary containment isolation valves rather than the complete elimination of weld inspections as proposed in the May 24, 1995 letter. PECO may implement the reduced program during the Unit 3 refueling

G. Hunger, Jr.

- 3 -

September 15, 1995

outage 3R010 and may continue to implement it for subsequent Unit 2 and Unit 3 refueling outages.

If you have any questions on this matter, do not hesitate to contact me at (301) 415-1428.

Sincerely,

/s/

Joseph W. Shea, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-277/50-278

Enclosure: Criteria Related to Inspection
Requirements for RWCW Welds Outboard
of Second Isolation Valves.

cc w/encl: See next page

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