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Rulemaking and Directives Branch
Office of Administration
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Subject: Comments Concerning Draft Regulatory Guide DG-1222,
"Control of Preheat Temperature for Welding of Low-Alloy Steel"
(Federal Register Notice 74FR31993, dated July 6, 2009)

Exelon Generation Company, LLC (Exelon) is submitting this letter in response to a request from the Nuclear Regulatory Commission (NRC) for comments concerning Draft Regulatory Guide DG-1222, "Control of Preheat Temperature for Welding of Low-Alloy Steel." DG-1222 is proposed Revision 1 to Regulatory Guide 1.50 (same title), dated May 1973.

10CFR50, Appendix B, requires that measures be established to ensure control of materials and of special processes such as welding and that proper process monitoring be performed. DG-1222 describes a method acceptable to the NRC for implementing these requirements with regard to the control of welding for low-alloy steel components during initial fabrication.

Exelon appreciates the opportunity to comment on DG-1222, and offers the following comments for consideration by the NRC.

General Comments

Section C, "Regulatory Position"

Item 2 states that: "For production welds, the preheat temperature should be maintained until final postweld heat treatment or a hydrogen bakeout is performed between 200 and 400 °C (400 and 750 °F) for a minimum of four hours... ." Exelon considers the minimum "four-hour" period to be excessive for leaner material chemistries, thinner materials, and standard groove weld joint design and high heat input weld processes. Exelon suggests that a graduated scale approach be considered to allow for the variance associated with the factors previously discussed.

If you have any questions or require additional information, please do not hesitate to contact Mr. Richard Gropp at 610-765-5557.

Respectfully,

D. P. Helker

David P. Helker
Manager - Licensing

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