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WISCONSIN PUBLIC SERVICE CORPORATION



P.O. Box 1200, Green Bay, Wisconsin 54305

July 7, 1980

Mr. James G. Keppler, Regional Director
Office of Inspection & Enforcement
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Gentlemen:

Docket 50-305
Operating License DPR-43
Kewaunee Nuclear Power Plant
IE Bulletin 80-08: Examination of Containment Liner Penetration Welds

The information submitted in this letter is in response to IE Bulletin 80-08. The numbering is consistent with the items addressed by the bulletin.

1. "Determine if your facility contains the flued head design for penetration connections, or other designs with containment boundary butt welds(s) between the penetration sleeve and process piping as illustrated in Figure NE 1120-1, Winter 1975 Addenda to the 1974 and later editions of the ASME B&PV Code."

RESPONSE: The Kewaunee Plant has utilized multiple flued head penetrations in nine "hot" penetrations of the Kewaunee containment. The multiple flued head design is similar to the penetrations referenced by the bulletin, except that the Kewaunee design includes a "guard pipe" for the penetration. Section 5.2 of the Kewaunee FSAR includes a description of the "hot" penetration design used at KNPP; the design is shown graphically in Figures 5.2-5, 5.2-5a and 5.2-7.

2. "If an affirmative answer is reached for Item 1, determine the following:
 - a. Applicability of the ASME Code including year and addenda and/or Regulatory Guide 1.19,

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- b. Type of nondestructive examinations performed during construction,
- c. Type of weld joint (including pipe material and size) and whether or not backing bars were used,
- d. Results of construction nondestructive examinations, i.e., if repairs were required, this should be identified including extent of repairs and description of defects encountered during repair, if known."

- RESPONSE:
- a. As noted on page 5.2-22; item E in the Kewaunee FSAR; "The process and guard pipes and flued heads were designed, specified and fabricated in accordance with the Code for Pressure Piping, USASI B31.1.0-1967, N-7, and ASME Boiler and Pressure Vessel Code Section III, 1968, Class B, Code cases 1177, 1330 and 1425."
 - b. All containment boundary welds on the hot piping penetrations at Kewaunee were inspected by radiography (RT). Additionally, all welds were either Liquid Penetrant Tested (PT) or Magnetic Particle Tested (MT). Welds were repaired as necessary when unacceptable results were indicated by the non-destructive examinations. All welds were shown to be acceptable by final radiographic inspection.
 - c. All containment boundary welds on the hot piping penetrations are of the open butt type with consumable inserts. Backing bars were not used on these welds. All flued head penetration material is ASTM A105 Grade II, ASTM A182-F316 or ASTM A182-F304. The piping material welded to these penetrations is A155 KC-F-70 Class 1 or ASME SA333 Grade 1. The sizes of the penetrations are 50", 34", 24" or 14" diameter with a 1/2" wall thickness (nominal).
 - d. During initial construction the non-destructive examination of the containment boundary welds on the hot piping penetrations indicated areas of porosity, slag inclusions, lack of fusion, suckback and drop through. Those welds which were not acceptable were repaired as necessary to conform to code requirements.
3. "For those facilities committed during construction to perform volumetric examination of such penetrations through SAR commitments which have not performed radiography, justify not performing radiography or submit plans and schedules for performing radiographic examinations."

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RESPONSE: All containment boundary welds on hot piping penetrations at the Kewaunee Plant have been inspected by radiography and meet the applicable requirements. Therefore, this item does not apply to KNPP.

Based on the results of the records review performed in response to this bulletin, no further action is required.

Very truly yours,



E. R. Mathews, Vice President
Power Supply & Engineering

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Attach.

cc - Dir, Div of Reactor Construction Inspection
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