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 AUTH. NAME AUTHOR AFFILIATION  
 RHODE, G. K. Niagara Mohawk Power Corp.  
 RECIP. NAME RECIPIENT AFFILIATION  
 DENTON, H. R. Office of Nuclear Reactor Regulation

SUBJECT: Responds to IE Bulletin 79-03. Abnormal indications of porosity have been discovered in Youngtown 130 drywell floor downcomers. Will use criteria of ASME III, 1977 Addendum, Paragraph NC-2553, NRC approval requested by 790727.

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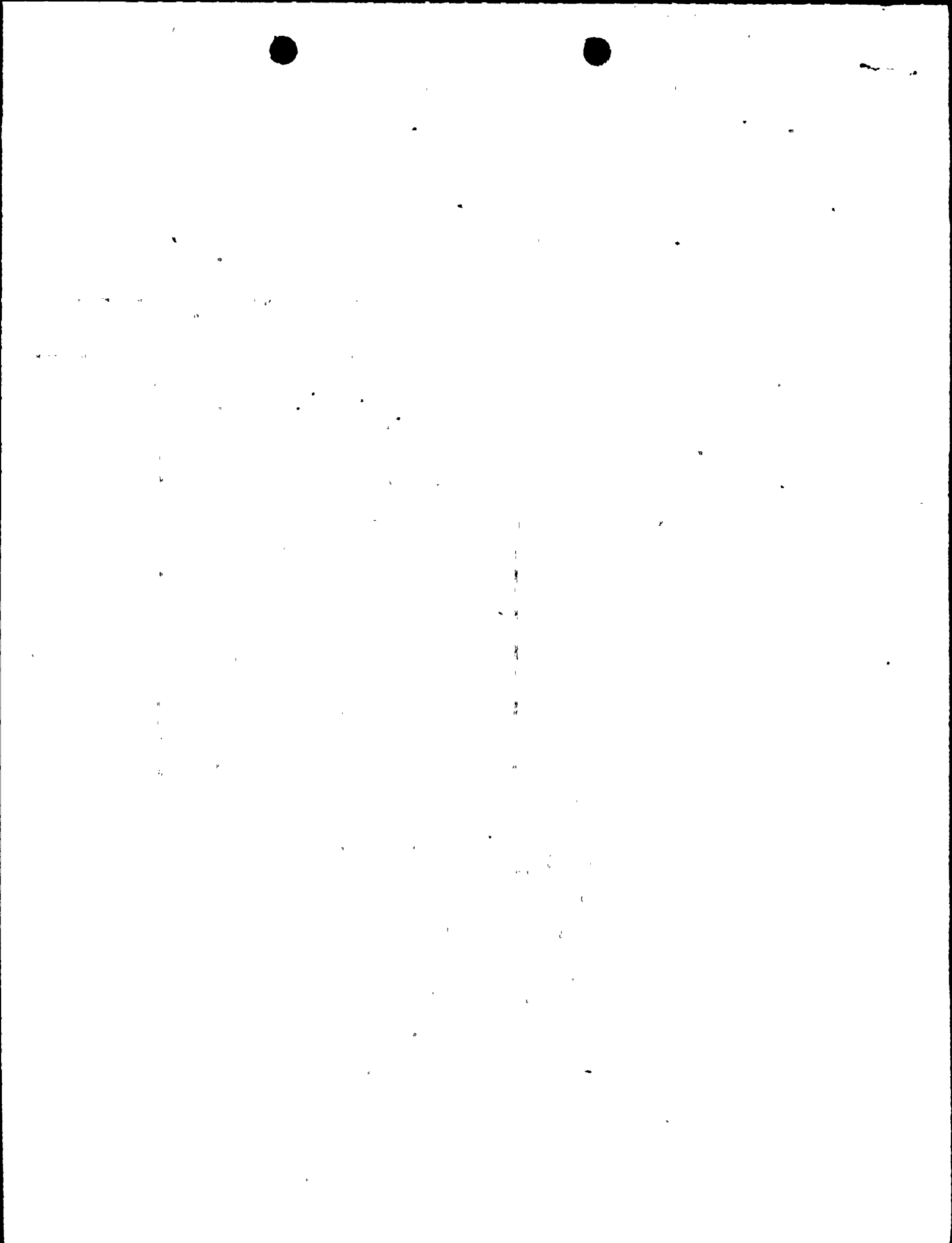
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June 28, 1979

Mr. Harold Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Denton:

**REGULATORY DOCKET FILE COPY**

Re: Nine Mile Point Unit 2  
Docket No. 50-410

The Nuclear Regulatory Commission's I. E. Bulletin 79-03 requested Niagara Mohawk to determine if ASME SA-312 Type 304 or other welded (without filler metal) pipe manufactured by Youngstown Welding and Engineering Company is planned for use in safety-related systems at Nine Mile Point Unit 2. As reported to the Region I Inspection and Enforcement Office on May 16, 1979, we have determined that the 130 drywell floor downcomers were manufactured by Youngstown Welding and Engineering Company and require volumetric examination of the longitudinal weld.

The downcomers, which were designed, fabricated and code-stamped to the requirements of ASME III, Boiler and Pressure Vessel Code, 1974 Edition through the Summer 1976 Addendum, have been examined by radiographic methods. Some abnormal indications of porosity have been discovered.

It is Niagara Mohawk's intention to use the acceptance criteria of Paragraph NC-2553 of ASME III, 1977 Edition through Summer 1977 Addendum for these welds. This is allowed by the General Requirements Section of the ASME III Code in Paragraph NA-1140 which states that, "It is permitted to use specific provisions within an Edition or Addenda provided that all related requirements are met." Per subparagraph (g) of Paragraph NA-1140, we are requesting approval to use the acceptance criteria of the ASME III 1977 Edition through Summer 1977 Addendum for rounded indications. The 1977 Edition of the ASME Code through Summer 1977 Addendum has been reviewed and it has been determined that there are no additional related requirements the downcomers must meet.

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Mr. Harold Denton  
U. S. Nuclear Regulatory Commission

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The later Edition of the code is acceptable, since the current acceptance criteria are considered more realistic for the type of anomaly (i.e., porosity) discovered in our investigation. Furthermore, there is no change in code allowable stress requirements from ASME III, 1974 Edition through Summer 1976 Addendum to ASME III, 1977 Edition including Summer 1977 Addendum.

Your approval by July 27, 1979 is requested to maintain our present schedule.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION



Gerald K. Rhode  
Vice President  
System Project Management

PEF/szd

Xc: Office of Inspection and Enforcement  
Region I Office  
King of Prussia, PA 19406



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