



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

February 6, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 3
Deferral of IGSCC Inspection Plan Welds
from the Fall 1991 Refueling Outage
NRC Docket No. 50-249

Reference: Conference call between CECo (M. Richter, et. al.)
and NRR (B. Siegel, et. al.) on September 24, 1991

Dr. Murley:

As discussed with your Staff during the referenced teleconference, Commonwealth Edison Company (CECo) is requesting to defer the scheduled ultrasonic examination of two (2) Unit 3 welds (28" Recirculation System welds) during the unit's current refueling outage (Fall 1991). These examinations are part of the inspection program for piping susceptible to intergranular stress corrosion cracking (IGSCC). The two (2) cast stainless steel elbow-to-cast stainless steel pump body welds (weld 28-11 on Recirculation Loop 'A', weld 28-K12 on Recirculation Loop 'B') are currently classified as Category 'G' welds in the IGSCC program. This deferral request is based on the current accessibility and configuration of the welds.

A large whip restraint (cable-tray design whip restraint) is located on each weld, with the tray of the restraint encompassing the weld surface. Removal of the restraint for inspection purposes necessitates cutting of the tray, which would prevent its reuse. Therefore, the whip restraint would have to be modified for reinstallation. Based on the current dose rate at the elbows (approximately 0.5 rem/hour), it is estimated that in excess of 10 person-rem would be expended for the removal (and reinstallation) of each whip restraint.

Once the welds are accessible for inspection purposes, the current configuration (outside surface contour) of each weld is not conducive to obtaining a meaningful examination. The contour of each weld is shown in Figures 1 (weld 28-11) and 2 (weld 28-K12). As shown in the Figures, the 1.8" wide weld crown is located in the middle of a trough approximately 4.5" wide. This configuration is too restrictive for proper placement and movement of the transducer search unit(s) to obtain sufficient weld coverage. In order to obtain a meaningful examination, machining of elbow material would be required, which would result in an additional exposure of approximately 10 person-rem for each weld. Machining on the elbow would also necessitate detailed evaluations to ensure structural integrity is maintained. In addition to the configuration considerations, CECo does not currently possess a calibration block for this weld application which meets the requirements of ASME Section XI.

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For each weld, CECo has obtained ferrite measurements (presented in the Figures) for the elbow, weld, and pump casing. The high value of the measured ferrite numbers indicate that the welds should be resistant to IGSCC, and therefore deferral of the inspection for one refueling outage should pose no safety concern.

As discussed with your Staff in the referenced teleconference, CECo is pursuing an evaluation to justify the reclassification of these welds to Category 'A' in the IGSCC program. The results of that evaluation will be submitted for Staff review.

CECo appreciates the Staff consideration of this deferral request. Please contact this office should further information be required.

Respectfully,

Milton H. Richter

Milton H. Richter
Nuclear Licensing Administrator

Figure 1: Diagram of Weld 28-11
Figure 2: Diagram of Weld 28-K12

cc: A. Bert Davis - Regional Administrator, Region III
B. L. Siegel - NRR Project Manager, Dresden
W. G. Rogers - Senior Resident Inspector, Dresden
J. F. Schapker - Region III Inspector

FIGURE 1
DIAGRAM OF WELD 28-11

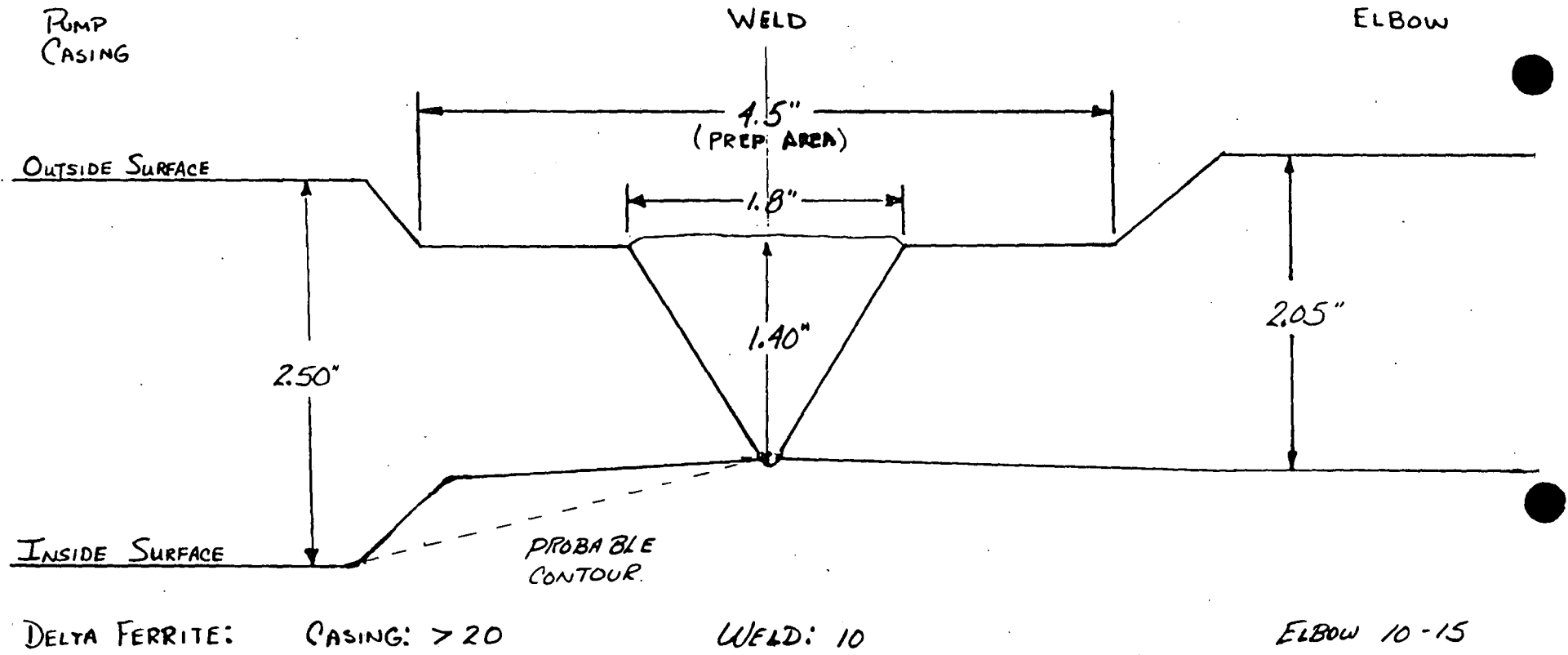


FIGURE 2
DIAGRAM OF WELD 28-K12

