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February 28, 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 Units 2 and 3
Installation of Corrosion Resistant Cladding
NRC Docket Nos. 50-237 and 50-249

Dr. Murley:

Commonwealth Edison Company (CECo) has been evaluating the application of corrosion resistant cladding (CRC) to address inaccessible Category G welds associated with the Intergranular Stress Corrosion Cracking (IGSCC) Inspection Program (Generic Letter 88-01) for Dresden Station Units 2 and 3. CECo proposes to apply CRC during the next scheduled refueling outages for Dresden Units 2 and 3.

The welds to receive the CRC are associated with the Isolation Condenser System for each unit. The welds are located inside penetration assemblies X-108A (14" Isolation Condenser steam supply) and X-109B (12" Isolation Condenser return) for Unit 2, and penetration assembly X-108A (14" Isolation Condenser steam supply) for Unit 3. These welds are on the flued head fittings where the flued head is welded to the process pipe. The Isolation Condenser return line (X-109A penetration) for Unit 3 is unaffected because the piping was replaced in the Recirculation Pipe Replacement outage in 1986 and therefore have been classified as Category A welds.

Application of the CRC on the inside surface of the inaccessible welds is expected to protect the heat-affected zone (HAZ) with IGSCC resistant weld metal. Following application of the CRC, these welds will be considered resistant to IGSCC (Category A welds) as described in NUREG-0313, Revision 2 (Section 2.0, "Method to Reduce or Eliminate IGSCC"); however, the welds will remain inaccessible for any future nondestructive examinations. At this time, no other mitigation or monitoring method is considered to be required in conjunction with the CRC.

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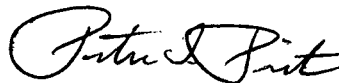
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The specific methods and process control procedures for application of the CRC will be consistent with those described in EPRI Report NP-2033-LD, "BWR Large-Diameter Pipe Repair/Replacement Study", Volume 2 (section on Typical Procedures for Corrosion Resistant Cladding). CECO's approach for the application of the CRC will be to remove a short section of the process pipe at the outboard end of the flued head, prepare the inside of the pipe and apply the CRC with a Gas-Tungsten Arc Welding (GTAW) head. The design of the "Repair Inlay" will take guidance from the standard weld overlay design criteria described in NUREG-0313, Revision 2.

Modifications for the application of CRC are currently scheduled to be completed during the next refueling outages for Units 2 and 3 (January 1993 and September 1993, respectively). This schedule is predicated on receipt of the necessary funding. Therefore, CECO requests NRR concurrence that the described application of CRC is an acceptable IGSCC mitigation technique and the inaccessible Isolation Condenser welds can be classified as Category 'A' in the IGSCC Program without further inspection or monitoring.

Please contact this office should further information be required.

Respectfully,



Peter L. Piet
Nuclear Licensing Administrator

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