



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 20, 1995

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 2
Proposed Re-Classification of Cast Recirculation Pump Casing-to-Cast
Elbow weld (202-1B-D4) From Generic Letter 88-01 "Category G" to
"Category E"
NRC Docket No. 50-237

References: (a) P. Piet (ComEd) letter to T. Murley (NRR), dated May 28, 1993.
(b) J. Stang (NRR) letter to D. Farrar (ComEd), dated
October 15, 1993.

In Reference (a) Commonwealth Edison (ComEd) provided follow-up information concerning ComEd's proposal to re-classify two Recirculation welds per unit to "Category A" welds per Generic Letter 88-01. Specifically, this letter provided measured ferrite contents and documented carbon contents for each elbow, weld, and pump casing. This data supported the re-classification of each of the subject welds to "Category A", with the exception of the Dresden Unit 2 "B" recirculation loop weld (202-1B-D4). Because of the low measured ferrite data and the high carbon content of this weld, ComEd committed to maintain the "Category G" classification of this weld while alternatives were evaluated to support the re-classification. This letter also stated that ComEd would notify the NRC Staff and request approval of any alternate re-classification techniques prior to the D2R14 refuel outage (currently scheduled for 6-2-95). In Reference (b) the NRC gave approval for the re-classification requested in Reference (a).

The purpose of this letter is to propose an alternate method for the re-classification of the Dresden Unit 2 "B" recirculation loop weld (202-1B-D4) from "Category G" to "Category E".

The subject weld joins the cast stainless steel recirculation pump casing to the 28 inch cast stainless steel suction elbow. The weld crown is located in the middle of a machined trough approximately four inches in width and 0.5 inches in depth. This configuration is too restrictive for proper placement and movement of the transducer search units to obtain sufficient weld coverage in the axial direction (i.e., to search for circumferential flaws). Additionally, the ability of currently available ultrasonic techniques to interrogate the complete weld volume cannot be assured due to the highly attenuative nature of the casting materials.

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In lieu of performing a potentially inadequate ultrasonic examination of this highly attenuative weld per the requirements of Generic Letter 88-01, "Category G" during the upcoming D2R14 refuel outage, ComEd proposes the following alternative:

A pro-active full structural weld overlay meeting the requirements of Generic Letter 88-01 and NUREG-0313, Revision 2 will be applied to weld (202-1B-D4) during the upcoming D2R14 refuel outage. Upon completion, a baseline ultrasonic examination of the full volume of the weld overlay will be performed per the requirements of Generic Letter 88-01, by personnel qualified by EPRI for examination of weld overlays. Due to the highly attenuative nature of the base material, no examination of the base material below the full structural weld overlay will be performed. Upon completion of the baseline examination the weld will be re-classified as "Category E". Future examinations of the weld overlay will be performed as described above per the frequencies established in Generic Letter 88-01 for "Category E" weldments, which is once every other refuel outage.

ComEd requests a response from the NRC Staff to the proposed alternative re-classification of the subject weld within 90 days of receipt of this letter to facilitate planning for the upcoming D2R14 refuel outage. The outage is currently scheduled to begin on June 2, 1995 with plans for the initiation of the weld overlay to be shortly thereafter.

If there are any questions concerning this matter, please contact this office.

Respectfully,



Peter L. Piet
Nuclear Licensing Administrator

cc: J. B. Martin, Regional Administrator - RIII
J. F. Stang, Project Manager - NRR
M. N. Leach, Senior Resident Inspector - Dresden
Office of Nuclear Facility Safety - IDNS