50-237

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

July 21, 1995

Mr. D. L. Farrar, Manager
Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: RECLASSIFICATION OF RECIRCULATION LOOP "B" WELD (202-1B-D4) (TAC NO. M91690)

Dear Mr. Farrar:

By letter dated January 20, 1995, Commonwealth Edison Company (ComEd) proposed an alternate method for the reclassification of the Dresden, Unit 2 "B" recirculation loop weld from a "Category G" weld to a "Category E" weld in accordance with the guidelines of Generic Letter (GL) 88-01, "Intergranular Stress Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping" dated January 25, 1988. The proposal would reclassify recirculation loop "B" weld (202-1B-D4) from a Category G weld to a Category E weld by applying a pro-active full structural weld overlay on the subject weld. In accordance with GL 88-01, a Category G weld is a weld made of material susceptible to IGSCC and the weld has not been inspected; a Category E weld is a degraded weld mitigated either by applying a weld overlay or stress improvement. Commonwealth Edison Company plans to perform the weld overlay during the upcoming refuel outage (D2R14). The subject weld, joining the cast stainless steel recirculation pump casing to the 28-inch cast stainless steel suction elbow, is susceptible to IGSCC because the test data had shown that it contained low ferrite and high carbon content.

Commonwealth Edison Company stated that because of the highly attenuative nature of cast materials and the local physical obstruction that would restrict transducer movement near the weld crown, a successful ultrasonic examination of the subject weld that would cover the complete weld volume cannot be assured. Therefore, in lieu of performing a potentially inadequate ultrasonic examination of the subject weld, ComEd proposed to apply a weld overlay in accordance with the requirements of GL 88-01 and NUREG-313, Revision 2. After completion of the weld overlay, a baseline ultrasonic examination of the weld overlay will be performed. However, in the January 20, 1995, letter, ComEd requested relief from GL 88-01 guidelines to perform an ultrasonic examination of the base material below the weld overlay because of the highly attenuative nature of ultrasonic waves in cast materials.

The staff has reviewed the proposal of weld reclassification as it is discussed in the January 20, 1995, letter. The staff finds reclassifying weld 202-1B-D4 from a Category G weld to a Category E weld is in accordance with GL 88-01 guidelines and is acceptable.

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However, the staff will require a baseline inspection of the subject weld including the upper 25 percent of the base material below the weld overlay on a best effort basis to access the base material integrity. This non-destructive examination (NDE) of the base material below the overlay may be delayed until the first required inspection of the weld overlay in accordance with the guidelines of GL 88-01. The delay is warranted because of the current lack of a calibration block for the specific weld. Without the calibration block, the NDE of the weld would not produce acceptable results. If actual difficulties are encountered in the examination of the base materials, ComEd may submit a request for relief from inspecting the base material of the subject weld for the subsequent examinations if adequate justification can be provided. In addition, ComEd should follow the provision of Code Case N-504 for the weld overlay design. The results should be maintained on site and be available for inspection.

If you have any questions concerning this issue please contact me at (301) 415-1345.

Sincerely,

Original signed by

John F. Stang, Senior Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-237

cc: See next page

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cc:

Michael I. Miller, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Mr. Thomas P. Joyce
Site Vice President
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

Mr. D. Bax
Station Manager, Unit 2
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

Mr. J. Heffley
Station Manager, Unit 3
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
6500 North Dresden Road
Morris, Illinois 60450-9766

Regional Administrator
U.S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Chairman
Grundy County Board
Administration Building
1320 Union Street
Morris, Illinois 60450

John Willis, Coordinator
Nuclear Campaign
Greenpeace International
1436 U Street, NW.
Washington, DC 20009