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Dresden Generating Station  
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August 6, 1999

JMHLTR: #99-0084

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Dresden Nuclear Power Station, Unit 2  
Facility Operating License Nos. DPR-19  
NRC Docket Nos. 50-237

Subject: Notification of Inspection Deferral of Weld Overlays

- References:
- (1) Letter from J.R. Strosnider (NRC) to C. Terry, BWRVIP Chairman dated June 17, 1999.
  - (2) NRC Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping," dated January 25, 1988.
  - (3) Letter from the Boiling Water Reactor Vessel Internals Projects (BWRVIP) to the US NRC, "PROJECT NO. 704 – Request for Inspection Deferral of Weld Overlays," dated May 13, 1999.

The purpose of this letter is to notify the NRC of an inspection deferral on thirty-six (36) of thirty-eight (38) weld overlays. Inspection of these weld overlays are required by Commonwealth Edison (ComEd) Company's Dresden Nuclear Power Station Technical Specifications Section 4.0, "Surveillance Requirements." Paragraph E.6 states that the Inservice Inspection Program for piping identified in Reference 2 shall be in performed in accordance with the staff positions on schedule, methods, and personnel and sample expansion included in Reference 2 or in accordance with alternate measures approved by the NRC staff.

Reference 1 granted deferral for weld overlays which meet three criteria as noted below while the NRC reviews a report being sponsored by the BWR Vessels and Internals Project (BWRVIP), EPRI Report TR-110172, "Technical Justification for the Extension of the Interval Between Inspections of Weld Overlay Repair," dated February 1999.

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We have determined that the thirty-six (36) welds meet the three criteria listed in Reference (1):

1. The plant is operated in compliance with EPRI water chemistry guidelines, and
2. The overlay for which deferral is applied meets Generic Letter (GL) 88-01 or ASME Code Case N-504, "Alternative Rules for Repair of Class 1, 2, 3 Austenitic Stainless Piping," (full structural overlay or design) as opposed to a temporary duty (leakage barrier) overlay, and
3. The overlays for which the deferral is applied must have been inspected at least two (2) times without Inter-Granular Stress Corrosion Cracking (IGSCC) indications in the overlay. The two examinations include a baseline examination after overlay application and one examination that was completed after the overlay has been in service for at least one full fuel cycle.

Dresden Station has been in compliance with EPRI's Water Chemistry Guidelines since October of 1984 when ComEd Corporate Procedure NOD-CY.2, "BWR Water Chemistry Control Program," was approved. NOD-CY.2 incorporates the EPRI Water Chemistry Guidelines for use at all ComEd BWR units. The actions taken for exceeding Action Level One for reactor coolant in NOD-CY.02 are more restrictive than those in the EPRI BWR Water Chemistry Guidelines.

A review of all existing weld overlay repairs was performed and confirmed that all thirty-eight weld overlays on Dresden Unit 2 meet either the structural (thirty-seven) or the design (one) criteria in Generic Letter 88-01/NUREG-0313 Revision 2. All thirty-eight weld overlays on Dresden Unit 2 also meet ASME Code Case N-504, except a VT-3 examination was not performed after completion of all repair activities as specified in (k) of the Code Case. During the design of all weld overlays, the effects of shrinkage on the system were considered and no further evaluation was required. Dresden Station has no temporary duty (leakage barrier) overlays.

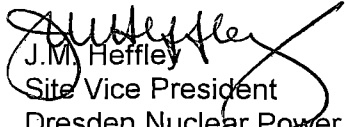
A summary of the Dresden Unit 2 Weld overlays is shown in the Attachment, "Weld Overlay Summary."

Based on the thirty-six (36) welds identified in the attachment meeting the above criteria, we are deferring, in accordance with Reference 1 until March 2001 or until the completion of the NRC staff review and approval of the proposed EPRI Report, whichever comes first. The remaining two overlays are scheduled for an inservice examination during the upcoming D2R16 outage.

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Should you have any questions concerning this letter, please contact Mr. D.F. Ambler at (815) 942-2920 extension 3800.

Respectfully,

  
J.M. Heffley  
Site Vice President  
Dresden Nuclear Power Station

Attachment, "Weld Overlay Summary"

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Dresden Nuclear Power Station

**ATTACHMENT**  
**Weld Overlay Summary**

All of the following weld overlays have had a preservice ultrasonic examination. The following full structural weld overlays have had at least one inservice examination with no evidence of IGSCC propagation into the weld overlay detected during any of the examinations:

Weld Number	Number of Inservice Exams per EPRI Report TR-110172	Number of Inservice Exams after "Standard" Overlay Applied**
8-12	3	3
8-K12	2	2
8-K13	4	3
8-14	2	2
8-K14	2	1
8-15	2	2
8-K15	2	2
8-16*	1	1
8-K16	2	1
8-K17	2	2
16-8	2	2
PD7-D11	4	3
PD7-D12	2	1
PD8-D9	2	1
PD8-D10	2	1
PD9-D7	2	1
PD9-D8	4	3
PD2-D4	3	2
PD2-D5	2	2
PD3-D1	2	2
PD3-D2	3	2
PD4-D22	2	2
PD4-D23	4	3
PD5-D20	2	1
PD5-D21	2	1
PD6-D18	2	1
PD6-D19*	1	1
PD1-D15*	1	1
PD1-D16	2	1
PD1/L2	2	1
PD19-D13	3	2
PD19-D14	4	3
L1-D24	2	2
L5-D3	2	1
202-5A/PD1	1	1

\* These welds were not flawed but a weld overlay was added to level loads on the piping system or as a preventative measure.

**ATTACHMENT**  
**Weld Overlay Summary**

\*\* This total may differ from the number of inservice exams shown for Dresden Unit 2 in EPRI Report TR-110172. The number of inservice examinations shown in this column only takes credit for inservice examinations performed after the weld overlay was classified a "standard" overlay. EPRI Report TR-110172 includes all inservice examinations before and after full structural overlay classification.

The following design overlay has had at least one inservice examination with no evidence of IGSCC propagation into the weld overlay detected during any of the examinations:

<b>Weld Number</b>	<b>Number of Inservice Exams per EPRI Report TR-110172</b>	<b>Number of Inservice Exams after "Design" Overlay Applied</b>
PS1A-D5	1	1