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March 10, 1980

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Comments on SEP Topic III - 8.C
Irradiation Damage Use of Sensitized
Stainless Steel and Fatigue Resistance
Dresden Unit 2
Docket 50-237

Dear Mr. Ziemann:

In response to your January 17, 1980 letter requesting our review of the draft evaluation of Systematic Evaluation Program Topic III - 8.C we do not believe the evaluation establishes that the vessel internals are sensitized. The draft also goes beyond the safety objective of reviewing reactor internals by including external piping. The inclusion of the external piping may be pertinent, however, if the pipe cracking experience is used as a demonstration that IGSCC could occur if the reactor internals are sensitized and the residual stress from welding is high.

The incidents on which the evaluation is based include recirculation bypass, core spray line, HPCI line and core spray return line cracks. All of these incidents involve piping and not reactor internals. Piping has been dealt with in considerable depth in previous NRC documents, but is not included in the scope of this one.

Another incident discussed involved the feedwater sparger. This incident has been attributed to thermal fatigue, a topic outside the scope of the survey and with little relation to material selection. The final incident discussed concerned fatigue cracking observed in a tack welded restrainer assembly. Again, fatigue is external to the scope of this study.

The conclusion based on these incidents, that reactor internal components have been degraded by the use of sensitized stainless steel is highly surprising in view of the fact that none of the incidents discussed within are pertinent to the specific safety objective. All incidents discussed involve either piping or fatigue failures.

Please refer any questions concerning this matter to this office.

One (1) signal original and thirty nine(39) copies are attached for your use.

Very truly yours,

Robert F. Janecek

Robert F. Janecek
Nuclear Licensing
Administrator
Boiler Water Reactors

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