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August 15, 1980

Mr. J. G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Supplemental Response to IE Bulletin
80-08, concerning "Examination of
Containment Liner Penetration Welds";
Dresden Station Units 2 and 3;
Quad Cities Station Units 1 and 2;
Zion Station Units 1 and 2;
LaSalle County Station Units 1 and 2;
Byron Station Units 1 and 2;
Braidwood Station Units 1 and 2
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454/455, and
50-456/457

Reference (a): D. L. Peoples letter to J. G. Keppler
dated July 9, 1980.

Dear Mr. Keppler:

Based on a discussion with Messrs. D. Danielson and
W. Keye of your staff, it was determined that an incorrect statement
was made in Reference (a) with respect to information contained in
Item 2.c. of the Zion Station response. In reviewing radiographic
film, Region III and Station personnel found backing rings had been
used for the field circumferential butt weld joining the flued head
or closure head to the containment sleeve. In a telecon with
Region III on July 29, 1980, Commonwealth Edison agreed to correct
the Zion response and review the accuracy of the responses for the
other stations. A response date of August 15, 1980, was agreed to
for both the Zion response and for the completion of the LaSalle
County Station response previously promised for August 8, 1980.
That review has determined that no revisions are required for the
Dresden and the Byron and Braidwood Station responses. In the case
of Quad Cities, it has subsequently been determined that backing
strips have been used on some but not all of the penetrations re-
viewed. However, full radiography was required for the Quad Cities
penetrations as well as penetrations on all of the other Commonwealth
Edison units referenced above. Therefore, as was indicated in Ref-
erence (a), further review beyond that originally reported and
supplemented herein, is not considered necessary.

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Zion Station

Item 2.c. of the July 9 response for Zion Station is revised to read as follows:

- 2.c. The circumferential butt welds between the flued head or closure head and the penetration sleeves were made using flat backing rings.

The original response for Item 2.c. was based on design drawings which showed weld end details typically used for open butt welding. The evidence of backing rings on radiographs of the field welds prompted a more detailed search of station records. This search found a supplement to the Piping Systems specification which required the shop assembly to outside sleeve extension welds to be made with backing rings. The installer's weld data sheets also show that flat backing rings were used. Documentation, therefore, exists at Zion Station to identify the type of weld joint and that backing rings were used consistent with the radiographic records.

LaSalle County Station

The LaSalle County Station Unit 1 and Unit 2 design requirements and NDE reports for the flued head containment penetrations have been reviewed. Attachment 1 summarizes the information developed by this review and contains all of the data requested by the NRC. This information indicates that the ultrasonic NDE problem discussed in IE Bulletin 80-08 does not apply to the LaSalle County Station because our flued head to sleeve weld joints were radiographically examined as required by the ASME Code.

Radiographic examination of the sleeve to head joint was also performed for the "semi-flued" head penetrations. These circumferential butt welds were made without backing rings. The radiographs are available at LaSalle County Station for review upon request.

Quad Cities Station

Item 2.c. of the July 9 response for Quad Cities Station is revised to read as follows:

- 2.c. The circumferential butt welds between the flued head or closure head and the penetration sleeves were made either with consumable inserts or with backing rings.

The original response for Item 2.c. was based on a small random sampling of the radiographic packages which found all of the welds of interest to be without backing rings. The recently completed review of radiographs from 12 penetrations of each unit found 5 and 3 penetrations, respectively, for Units 1 and 2 to have backing rings.

Dresden Station

The response for Item 2.c. is based on a review of 35 percent of the penetrations of each of the Dresden units. This review did not find any backing rings. It is possible that other penetration butt welds have backing rings. The primary intent of Bulletin 80-08 was to establish whether radiography had been performed. As all of the welds of interest were radiographed, we do not consider a more thorough review to establish whether any backing rings are present to be warranted.

If there are any further questions in this regard, please direct them to this office.

Very truly yours,

L. D. DelGeorge
for / J. S. Abel
Director of Nuclear
Licensing

Enclosure

ATTACHMENT 1

LaSalle County Station Flued Head Penetration
Information Requested by I.E. Bulletin 80-08

<u>Unit No.</u>	<u>Penetration No. (Note 1)</u>	<u>Butt Weld Joint Type</u>	<u>Joint Size</u>	<u>Volumetric NDE (Note 2)</u>	<u>Material Specification Sleeve</u>	<u>Material Specification Flued Head</u>	<u>Backing Bar Used?</u>	<u>Repair Required?</u>
1	M-1, M-4	Open	46"-1 3/8"	RT	SA-516 Gr.70	SA-350 Gr. LF1	No	No
1	M-2	Open	46"-1 3/8"	RT	SA-516 Gr.70	SA-350 Gr. LF1	No	Yes (Note 3)
1	M-3	Open	46"-1 3/8"	RT	SA-516 Gr.70	SA-350 Gr. LF1	No	Yes (Note 4)
1	M-5, M-6	Consumable Insert	44"-1 1/2"	RT	SA-516 Gr.70	SA-350 Gr. LF1	No	No
2	M-1, M-2, M-3, M-4	Open	46"-1 3/8"	RT	SA-516 Gr.60 or 70	SA-350 Gr. LF1	No	No
2	M-5, M-6	Open	44"-1 1/2"	RT	SA516- Gr.70	SA-350 Gr. LF1	No	No

Notes:

- Each unit of the LaSalle County Station contains six flued head (Integral Fitting) containment penetrations. These penetrations are used for the four 26" MS lines (M-1, M-2, M-3, and M-4) and the two 24" FW lines (M-5 and M-6)
- All of these weld joints were radiographically examined as required by the 1974 Edition of the ASME Code.
- Defect Type: Slag Excavation Sizes: 3/4"x1"x18" and 3/4"x1"x20"
- Defect Type: Porosity Excavation Sizes: 1 1/4"x1 3/8"x8" and 3/4"x1"x4" and 3/4"x1/4"x4"