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August 16, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Second 10 Year ISI and IST
Program, Supplement 1, ASME
Section XI ISI Requirements
for the LPCI Heat Exchanger
Tube Sheet Welds
NRC Docket No. 50-237/249

Reference (a): T. J. Rausch letter to D. G.
Eisenhut dated October 5, 1981.

Dear Mr. Eisenhut:

In accordance with 10 CFR 50.55a, Commonwealth Edison provided in Reference (a) the Second 10 Year Inservice Inspection and Testing (ISI and IST) Program applicable to Dresden Units 2 and 3 for the one hundred twenty (120) month interval beginning March 1, 1982. The LPCI/CCSW heat exchanger shell to tube sheet welds are required to be volumetrically examined by ASME Section XI, and are included in the program provided in Reference (a).

During the last Unit 3 outage (January, 1982 through May, 1982) a mock-up was fabricated to be used as a calibration standard and an attempt was made to volumetrically inspect the upper sheet to tube weld on the 3B LPCI/CCSW heat exchanger. A reflection was detected coming from the root area on both the calibration standard and the weld. After consulting with our corporate NDE expert and a welding specialist from the manufacturer of the heat exchanger, McQuay-Perfex, we have determined that this type of weld cannot be volumetrically examined satisfactorily and a relief request is warranted. These welds were made to Section VIII code requirements of pre-1971 vintage, and volumetric examination was not required. Straight submerged arc technique was used to make these welds, which results in a varying inhomogeneity along the root of the weld, that produces sonic reflections. As a result of the weld, interpretations of indications from the root region would be unreliable. Radiography would not be a suitable alternative because the joint geometry precludes the making of a meaningful radiograph.

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Attached are revised pages 24 of 44 for Unit 2 and 24 of 43 for Unit 3 which now refer to new relief request CR-9, which is also attached. Please insert these new pages in the Reference (a) program.

As noted in the relief request, there is a monthly operating surveillance run to detect tube leaks which also would verify the integrity of the heat exchangers. In addition, during each refueling cycle there is a leak detection and reduction program performed during which a LPCI system surveillance is run and the heat exchangers are visually inspected for leaks. It is felt that these programs will detect any problems that could develop in this area.

Your early attention to this matter and to your review of the entire program will be appreciated, because Dresden 2 will be using this program in the next refueling outage (beginning January, 1982).

Please address any questions you may have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this transmittal are provided for your use.

Very truly yours,



Thomas J. Rausch
Nuclear Licensing Administrator

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cc: Region III Inspector - Dresden

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