



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

October 26, 1983

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Dresden Station Unit 3  
IGSCC Inspection Order List  
of Welds Not Being Inspected  
NRC Docket Nos. 50-249

References (a): IGSCC Inspection Order Confirming  
Shutdown for Dresden Station  
Unit 3 dated August 26, 1983.

(b): Cordell Reed letter to H. R. Denton  
dated September 6, 1983.

Dear Mr. Denton:

In accordance with Section III.C.2 of the referenced Order we are submitting a list of welds which will not be inspected this outage. Attachment I identifies the welds by system, location and size. Attachment II provides adequate technical justifications for not conducting these examinations.

If you have any questions on this matter, please contact this office.

One signed original and forty (40) copies of this letter and its attachments are provided for your use.

Very truly yours,

B. Rybak  
Nuclear Licensing Administrator

lm

cc: R. Gilbert  
NRC Resident Inspector - Dresden

7493N

8311030124 831026  
PDR ADOCK 05000249  
G PDR

13001  
11

## ATTACHMENT I

LIST OF 304 SS PIPING WELDS ( $\geq 4$ " N.P.S.) THAT  
WILL NOT BE INSPECTED DURING THIS CURRENT OUTAGE

SYSTEM	NUMBER OF WELDS	SIZE	LOCATION	COMMENTS
Reactor Water Cleanup	1	8"	Drywell Penetration X-113	Inaccessible for UT (1)
Isolation Condenser	1	14"	Drywell Penetration X-108A	Inaccessible for UT (1)
Isolation Condenser	1	12"	Drywell Penetration X-109B	Inaccessible for UT (1)
Core Spray	2	10"	Drywell Penetration X-149 A & B	Inaccessible for UT (1)
LPCI Injection	2	16"	Drywell Penetration X-1116 A & B	Inaccessible for UT (1)
Shutdown Cooling	1	16"	Drywell - 2nd Level	Inaccessible for UT (2)
LPCI Injection	2	16"	Torus	Inaccessible for UT (2)
Reactor Water Cleanup	2	10"	Cleanup Pipeway Elevation 545'6"	Inaccessible for UT (2)
Recirculation - A Suction	1	28"	Drywell - Basement	Not inspectable due to material structure (3)
Recirculation - B Suction	1	28"	Drywell - Basement	Not inspectable due to material structure (3)
Recirculation Bypass A & B Loops	22	4"	Drywell - Basement	Low carbon - not susceptible to IGSCC (4)

ATTACHMENT II

TECHNICAL JUSTIFICATIONS

1. These Class 1 lines, due to the design of primary containment penetration assembly, have one circumferential pressure retaining weld that is inaccessible for volumetric examination. Figure 1 or 2 clearly illustrates the design constraints which make it extremely impractical to examine the subject welds by volumetric technique. Relief from Inservice Inspection requirement for these welds has been granted by the NRC staff.
2. The design of these branch pipe connection welds calls for the use of reinforcement saddles. This saddle is fillet welded over the actual pressure retaining branch pipe to main pipe weld, completely encasing it as illustrated on figure 3. Relief from Inservice Inspection requirement for this weld has been granted by the NRC staff.
3. In the recirculation system there are two (02) elbow to recirculation pump casing welds (suction side). The elbow and pump casing material is type CF8M cast austenitic stainless steel which has been demonstrated to be highly resistant to oxygen-assisted stress corrosion in the as-installed condition per NUREG-0313, Rev. 1. The high ultrasonic beam attenuation of the cast stainless steel base material inhibits meaningful examination of the two subject welds by ultrasonic method. The examination requirement is thus impractical for these two welds because of material structure.
4. A & B recirculation bypass loops were replaced with 304L stainless steel material in 1975. Since this material is conforming and not susceptible to IGSCC, there is no need to inspect these areas.

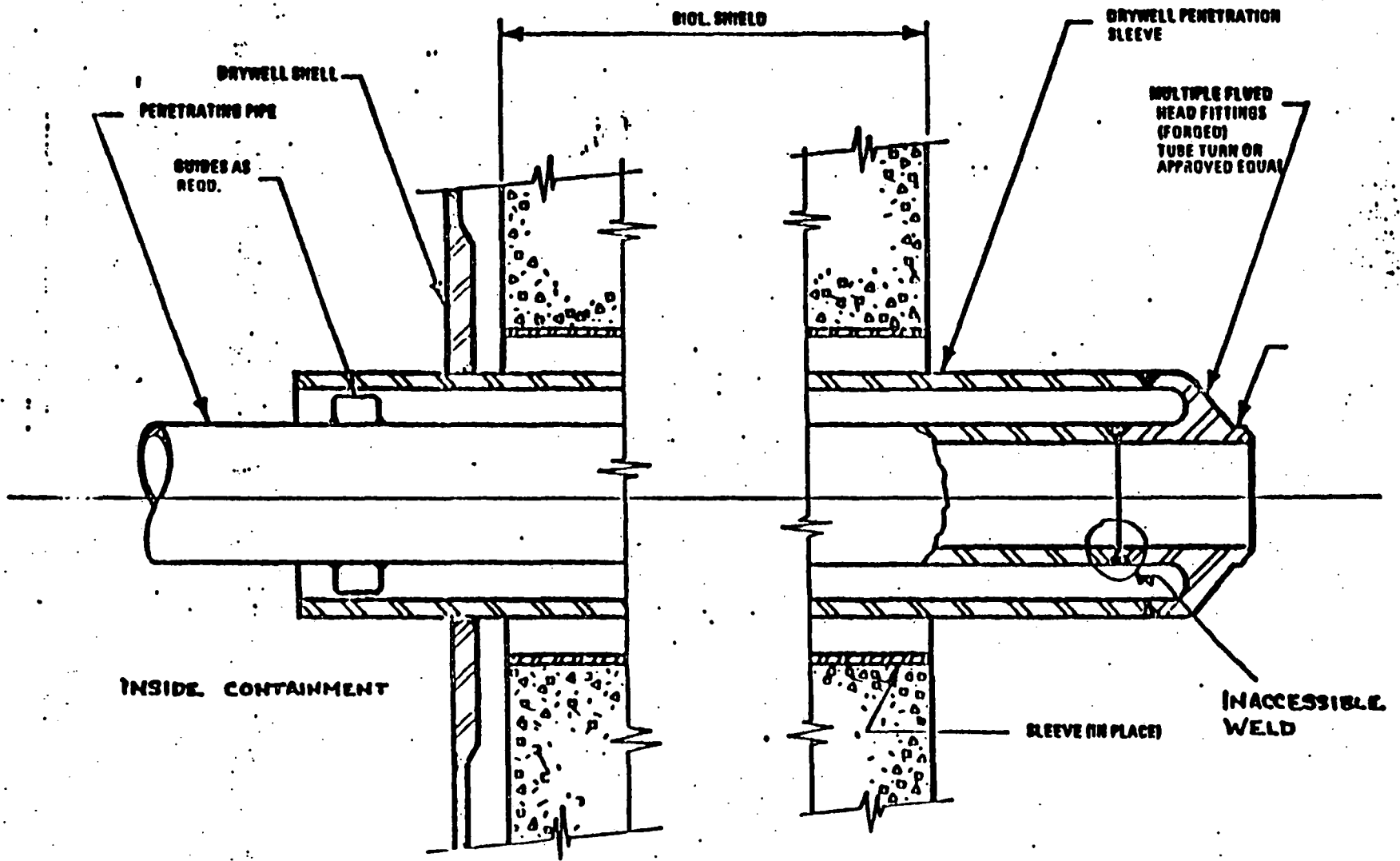


Figure 4 Center Section—Cold Fluid Piping Penetration Assembly

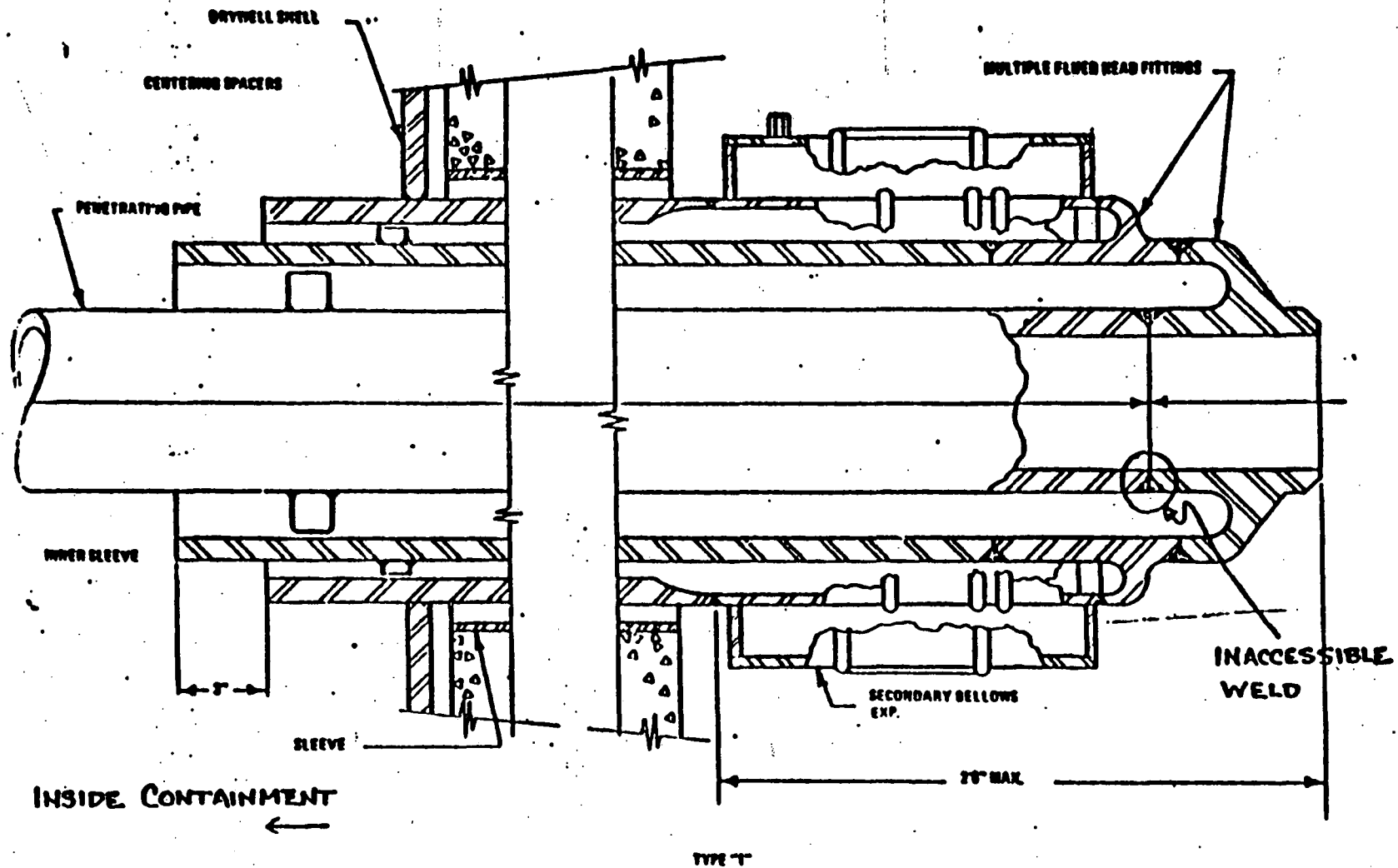


Figure 2 Center Section—Hot Fluid Piping Penetration Assembly

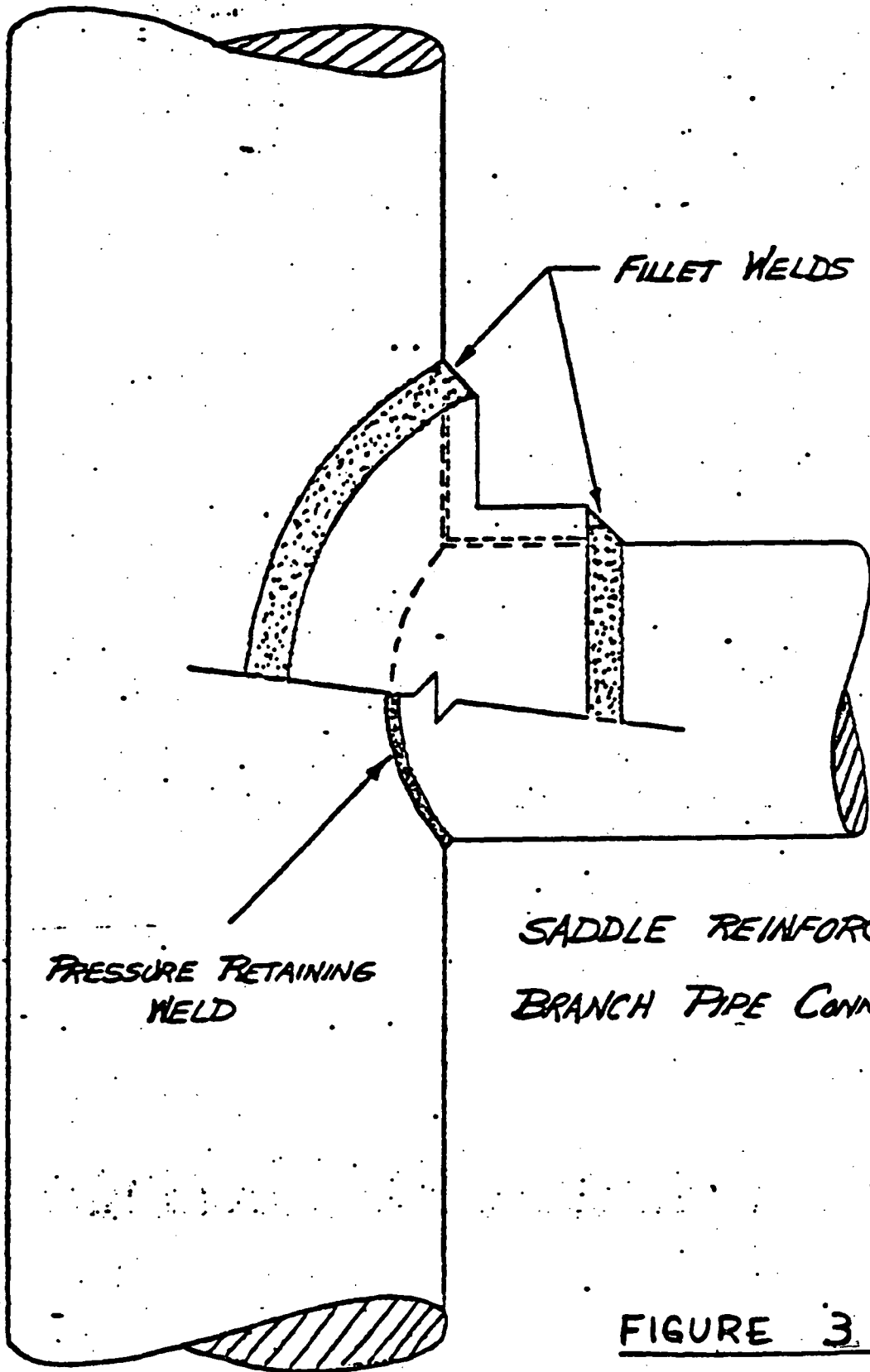


FIGURE 3