



**Commonwealth Edison**  
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April 22, 1985

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

Subject: Dresden Station Unit 2  
RCU Piping Modifications  
at Penetration and Inside  
the Drywell  
NRC Docket No. 50-237

References (a): B. Rybak letter to H. R. Denton  
dated December 19, 1984.

(b): J. A. Zwolinski letter to D. L. Farrar  
dated March 22, 1985.

Dear Mr. Denton:

Reference (a) submitted our pipe weld inspection results and our plan to replace a specific run of RCU piping outside containment. As noted in Reference (b), Commonwealth Edison had later elected to also replace RCU piping inside containment up to MOV 2-1201-1. Your Staff has requested a formal submittal detailing that replacement effort. Our discussion of the replacement project inside containment is provided as an Attachment to this letter.

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

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

Very truly yours,

B. Rybak  
Nuclear Licensing Administrator

lm

cc: NRC Resident Inspector - Dresden w/Att.  
R. Gilbert - NRR w/Att.

Attachment

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ATTACHMENT

RWCU PIPING MODIFICATIONS AT PENETRATION X-113

AND INSIDE THE CONTAINMENT

During the Dresden Unit 2 Fall 1984 outage, Reactor Water Clean-Up (RWCU) piping adjacent to the flued head at drywell penetration X-113 was replaced to eliminate flaws resulting from intergranular stress corrosion cracking (IGSCC). These flaws consisted of axial and circumferential cracks which are described in the B. Rybak letter to H. R. Denton dated December 19, 1984. Removal of this pipe permitted access to the inside surface of Weld 8-11N which was otherwise inaccessible. A liquid penetrant examination was performed to check the inside surface of that weld for IGSCC. The examination revealed seven axial flaws with a 1/2 inch maximum length on the pipe side of the weld.

The flaws in weld 8-11N were removed and the accessibility problem was resolved by eliminating the joint. This was accomplished by replacing the process piping between welds 8-10 and 8-11 with a continuous run of IGSCC-resistant pipe which passes through the flued head and is welded to it.

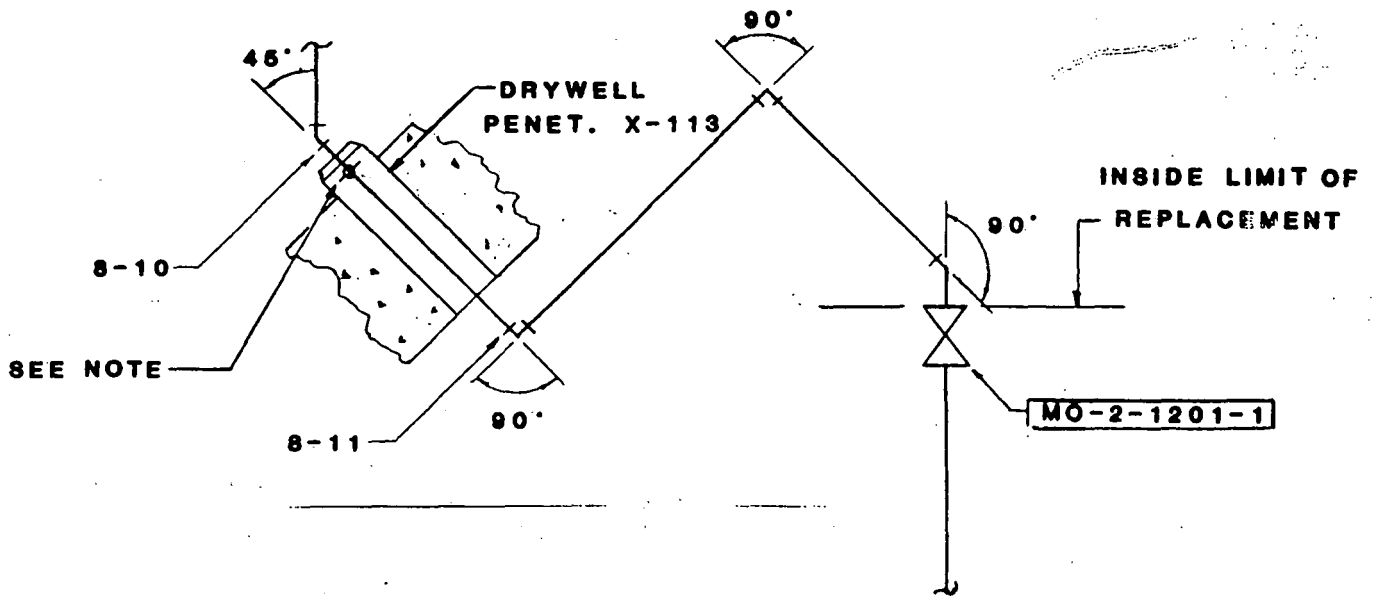
The piping inside the drywell included five joints for which weld overlay repairs were planned. It was decided to replace the penetration pipe which made replacement of adjacent internal piping a more practical option for four of the five planned overlays. The remaining joint, 8-K13, could not be readily isolated and was weld overlay repaired, as originally planned. Therefore, the RWCU piping replacement project, both inside and outside the drywell replaced all but one weld with crack indications.

The configuration of RWCU piping inside the drywell is shown in Figure 1. The modification involved rerouting the piping from the drywell penetration (X-113) to the inboard isolation valve (MO-2-1201-01) in order to avoid fabrication of a 72° elbow. A spring hanger support (2-1201-W-106) was also removed as a result of the rerouting. Adequacy of the modified pipe configuration has been confirmed by analysis. No other changes were made to the piping system inside the drywell.

FIGURE 1

RWCU PIPING REPLACEMENT INSIDE DRYWELL AND AT PENETRATION X-113.

LEGEND	
WELD	
OLD WELD	
VALVE	



NOTE: ORIGINAL LOCATION OF INACCESSIBLE WELD 8-11N  
(ELIMINATED BY CONTINUOUS REPLACEMENT PIPE  
BETWEEN WELDS 8-10 AND 8-11).