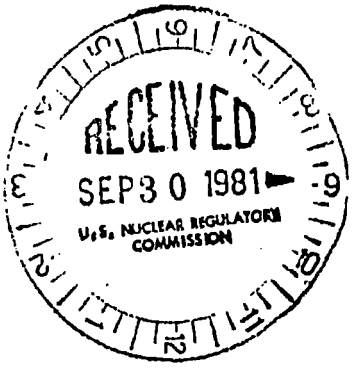
PSE&G

Public Service Electric and Gas Company 80 Park Plaza, T16D Newark, N.J. 07101 201/430-8217

Robert L. Mittl
General Manager - Licensing and Environment

September 17, 1981

Director of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20014



Attention: Mr. Robert L. Tedesco
Assistant Director for Licensing
Division of Licensing

Gentlemen:

HOPE CREEK GENERATING STATION
NO. 1 AND 2 UNITS
DOCKET NOS. 50-354 AND 355

Your letter dated August 5, 1981 (R. L. Tedesco, NRC to R. L. Mittl, PSE&G Co.) requested that we establish a separate test cycle for each cadweld splicing crew (or operator) in accordance with Regulatory Guide 1.10, "Mechanical (Cadweld) Splices in Reinforcing Bars of Category I Structures", Revision 1, January 2, 1973, (regulatory position 4). Our position on this matter is as follows:

Section 5.5.2 of the Hope Creek PSAR states that sampling will apply for each splicer crew, position, bar size, and grade. Also, PSAR Section 15.2.10 states that PSE&G will conform with Regulatory Guide 1.10. Both of the aforementioned PSAR commitments were made prior to 1974. These commitments were subsequently amended to reflect the latest technical criteria for cadwelding. Specifically, the sampling frequency for completed cadweld splices for each splicing crew was deleted to conform with the requirements of ANSI N45.2.5-1978 as endorsed by Regulatory Guide 1.94. All aspects of Regulatory Guide 1.10, with the exception of a separate test cycle for each splicing crew, have been implemented in the Hope Creek cadweld program.

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To date, the record of cadwelding at Hope Creek is excellent. As of August 18, 1981, 23,231 cadwelds have been visually inspected. Only 137 were rejected based on visual examination for a rejection rate of less than 0.6%. Of 539 cadwelds that were destructively tested, only one failed for a rejection rate of 0.185%. 97.6% of the tensile tested cadwelds failed at 120% or over of design strength. This record of quality supports the apparent basis of Regulatory Guide 1.94 which indicates (by omission) that separate test cycles for splice operators are not necessary.

The cadweld tensile test program requires that for each production cadweld tested, the specimen be replaced using two additional cadweld splices. Additional test cycles for each splice operator would result in extra costs for removal/testing of the tensile specimen, replacement with two cadwelds, and documentation of the test results and records for each splice operator. Additional test cycles for operators would add more time to cadweld operations with the potential for delay of concrete placement and adverse impact on the construction schedule.

In July, 1981 we received NRC notification that Regulatory Guide 1.10 was to be withdrawn and the current regulatory position on cadwelding would be covered by ANSI N45.2.5 per Regulatory Guide 1.94. Our cadweld program is in full compliance with your current regulatory position.

For the reasons outlined above, we request that you reconsider your position with regard to separate test cycles for splice operators as set forth in your August 5, 1981 letter.

Should you have any questions in this regard, do not hesitate to contact us.

Very truly yours,

CC: Mr. Albert Schwencer, Chief
Licensing Branch 2
Dr. Robert A. Gilbert
USNRC Licensing Project Manager
Mr. W. H. Bateman
USNRC Senior Resident Inspector