



**Commonwealth Edison**  
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January 24, 1986

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

Subject: Dresden Station Unit 3  
Plan for IGSCC-Related  
Activities for the Fall  
1985/Spring 1986 Recirculation  
Pipe Replacement Outage  
NRC Docket No. 50-249

Dear Mr. Denton:

This letter is written to summarize for your information Commonwealth Edison's plan for implementation of IGSCC-related activities during the Dresden Unit 3 Fall 1985/Spring 1986 Recirc. Pipe Replacement outage. Most of the IGSCC susceptible pipe is being replaced. However, there is some class 1 piping that will remain in place that is subject to Generic Letter 84-11 requirements. There are a total of fifty welds in this category.

The following paragraphs summarize the planned IGSCC-related activities:

1. The attached inspection plan addresses the requirements of Generic Letter 84-11 for Dresden Unit 3. A total of Thirty-Five welds will be ultrasonically examined.
2. Since the welds will not be replaced, stress improvement will be applied to the welds that are most susceptible to IGSCC, i.e. welds in systems operating over 200°F. Mechanical Stress Improvement (MSIP) will be applied to twenty-eight such welds. Consistent with the guidelines of Generic Letter 84-11, these welds will be ultrasonically inspected after application of MSIP.

MSIP will be applied as follows:

- (a) MSIP will be applied to twelve welds located on the 14" Isolation Condenser Steam Supply pipe that runs from the reactor vessel nozzle to the outboard isolation valve. Two welds located on this section of pipe will not receive application of MSIP. One of these welds is inaccessible. The other weld, the nozzle to safe end weld, has non susceptible I.D. cladding.

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- (b) MSIP will be applied to sixteen welds located on the 10" core spray pipe that runs from the inboard check valves to the drywell penetrations. Eleven welds on this pipe that run from outside containment at the penetration to the second isolation will not be stress improved. It has been demonstrated by temperature check that this piping sees low temperature application, under 200°F. Stress improvement will not be necessary for these welds.
3. If flaws are found within the inspection sample, the remainder of the fifty welds will be examined.
  4. The NDE Contractor Level II and III UT personnel performing evaluations of flaw indications will have been qualified at the EPRI NDE center by successfully completing the latest requalification program held in the fall of 1985. The same EPRI qualified Level II and Level III personnel will be performing the actual UT scanning. Where it is beneficial, automated UT techniques will be employed. Results of the contractor examinations will be provided to CECO. CECO. NDE personnel will be utilized for review and ultimate resolution of examination results. These CECO. personnel were qualified by the latest requalification program held at the EPRI NDE Center.
  5. If any additional IGSCC flaw indications are identified, they will be resolved consistent with the intent of Generic Letter 84-11. For circumferential indications requiring an overlay, we plan to apply full structural overlay (based on assumed 100% through wall, 360° circumferential length, and applied stresses). For welds with axial indications, a weld overlay will be applied to provide a leakage barrier.

The plan described above was established based on meeting all applicable requirements. One signed original and forty (40) copies of this letter and its attachment are provided for your use. If you have any questions regarding the information provided above, please contact this office.

Very truly yours,



J. R. Wojnarowski  
Nuclear Licensing Administrator

Attachment

cc: R. Gilbert - NRR  
Dresden Resident Inspector

1135K

DRESDEN UNIT 3

FALL 1985 AUGUMENTED ISI

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>
			<u>EXAMINED</u>	<u>1985</u>	<u>NOT</u> <u>EXAMINED</u>	<u>1985</u>	<u>APPLICATION</u>
<u>SYSTEM</u>	<u>SIZE</u>	<u>TOTAL</u>	<u>1983</u>	<u>SAMPLE</u>	<u>1983</u>	<u>SAMPLE</u>	<u>OF MSIP</u>
ISOLATION CONDENSER	14"	14	10	9	4	3 <sup>A</sup>	12
CORE SPRAY	10"	29	27	16	2 <sup>B</sup>	0 <sup>B</sup>	16
REACTOR HEAD VENT	4"	3	1	1	2	2	0
SPARE NOZZLE	6"	2	0	0	2	2	0
HEAD SPRAY	6"	2	0	0	2	2	0
		50	38	26	12	9	28

NOTES:

- A. ONE WELD IS INACCESSIBLE.
- B. TWO WELDS ARE INACCESSIBLE.

COLUMN

- 4 - TOTAL WELDS ON THE PARTICULAR SYSTEM THAT WERE EXAMINED AT THE LAST D-3 INSERVICE INSPECTION.
- 5 - GENERIC LETTER 84-11 INSPECTION SAMPLE.
- 6 - TOTAL WELDS ON THE PARTICULAR SYSTEM THAT WERE NOT EXAMINED AT THE LAST D-3 INSERVICE INSPECTION.
- 7 - GENERIC LETTER 84-11 INSPECTION SAMPLE.
- 8 - TOTAL WELDS THAT WILL RECEIVE STRESS IMPROVEMENT UTILIZING MECHANICAL STRESS IMPROVEMENT.