



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 22, 1989

Docket Nos. 50-249, 50-254
and 50-265

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Kovach:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) PERTAINING TO CECO'S
RESPONSE TO GENERIC LETTER 88-01 FOR DRESDEN, UNIT 3 (TAC NO. 69133)
AND QUAD CITIES, UNITS 1 AND 2 (TAC NOS. 69154 AND 69155)

Based on a preliminary review of your submittals in response to Generic Letter 88-01 for Dresden Unit 3 and Quad Cities Units 1 and 2, the staff and its contractor, Viking Systems International, have determined that additional information is needed to complete these reviews. The additional information needed is identified in the Enclosure. Please note that the Enclosure is common to both Dresden and Quad Cities except for Attachments A and B which are plant specific.

It is requested that this information be provided within 60 days of the date of this letter. If you have any questions regarding this request or schedule, please call Byron Siegel at (301) 492-3019 for Dresden and Thierry Ross at (301) 492-3016 for Quad Cities.

To expedite the review process, it is requested that a copy of your response be sent directly to the staff's contractor at the following address:

Dr. Armand A. Lakner
Director, Safety and Reliability
Viking Systems International
101 Chestnut Street
Gaithersburg, MD 20877

We acknowledge that this request for additional information could involve reiterating previously submitted material, but in a more convenient form for our contract reviewer. For the sake of efficiency of review, we request your indulgence. Please review this request carefully to assure that all requested material has been provided and is in the proper format.

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May 22, 1989

Mr. Thomas J. Kovach

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The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

151

Thierry M. Ross, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

151

Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

Enclosures:
As stated

cc: See next page

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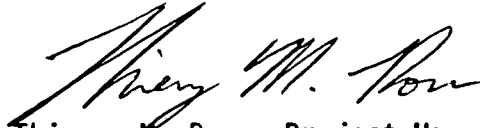
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Mr. Thomas J. Kovach

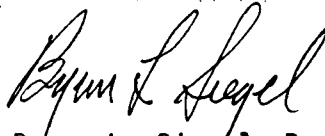
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Sincerely,



Thierry M. Ross, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects



Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

Enclosures:
As stated

cc: See next page

Mr. Thomas J. Kovach
Commonwealth Edison Company

Dresden Nuclear Power Station
Units 2 and 3

cc:

Michael I. Miller, Esq.
Sidley and Austin
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Chicago, Illinois 60603

Mr. J. Eenigenburg
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Morris, Illinois 60450

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
Rural Route #1
Morris, Illinois 60450

Chairman
Board of Supervisors of
Grundy County
Grundy County Courthouse
Morris, Illinois 60450

Regional Administrator
Nuclear Regulatory Commission, Region III
799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

Mr. Michael E. Parker, Chief
Division of Engineering
Illinois Department of Nuclear Safety
1035 Outer Park Drive, 5th Floor
Springfield, Illinois 62704

Mr. Thomas J. Kovach
Commonwealth Edison Company

Quad Cities Nuclear Power Station
Units 1 and 2

cc:

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799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

GENERAL QUESTIONS/REQUESTS

Reviews of several licensee submittals has shown that most (although not all) of the submittals commonly lack certain information that is needed for evaluation of the submittals. Thus, this general list of questions and requests has been prepared for submission to each of the licensees. For those portions of this attachment for which the requested information was supplied (in the detail requested herein) in the original submittal, the utilities may reference the relevant pages or tables in the original submittal and supply only the requested information that was not provided. Please certify that you comply with the staff positions in GL-88-01 or identify and justify any deviations taken.

Item 1. Position on NRC Staff Positions

Generic Letter 88-01 states on page 3:

"Pursuant to 10 CFR 50.54(f), you, as a BWR operating reactor licensee or construction permit holder, are requested to furnish, under oath or affirmation, your current plans relating to piping replacement, inspection, repair, and leakage detection. Your response should indicate whether you intend to follow the staff positions included in this letter, or propose alternative measures."

The staff positions outlined in Generic Letter 88-02 include positions on: (1) Materials. (2) Processes. (3) Water Chemistry. (4) Weld Overlay. (5) Partial Replacement. (6) Stress Improvement of Cracked Weldments. (7) Clamping Devices. (8) Crack Evaluation and Repair Criteria. (9) Inspection Method and Personnel. (10) Inspection Schedules. (11) Sample Expansion. (12) Leak Detection. (13) Reporting Requirements.

Please supply information concerning whether the licensee: (1) endorses these positions, (2) proposes alternate positions, exceptions, or provisions, and (3) is considering or planning to apply them in the future. Please describe any alternate positions, exceptions, or provisions that are proposed.

Please supply this information using a table such as the illustrated in the example shown in Table 1.

Table 1

Responses to NRC Staff Positions

<u>Staff Position</u>	<u>Licensee Response*</u>		<u>Licensee Has/Will**</u>		
	<u>Accept</u>	<u>Accept with Provisions</u>	<u>Requests with Alternate Position</u>	<u>Applied in Past</u>	<u>Consider for Future Use</u>
1. Materials					
2. Processes					
3. Water Chemistry					
4. Weld Overlay					
5. Partial Replacement					
6. Stress Improvement of Cracked Weldments					
7. Clamping Devices					
8. Crack Evaluation and Repair Criteria					
9. Inspection Method and Personnel					
10. Inspection Schedules					
11. Sample Expansion					
12. Leak Detection					
13. Reporting Requirements					

* Answer with "yes", "check mark" or "X" in appropriate column for each of the 13 NRC Staff Positions. List and explain each provision and/or alternate position (or reference original submittal if it contains the listing and explanation). Use separate page(s) if needed.

** Answer with "yes" or "no", as appropriate, in each column for each of 13 NRC Staff Positions.

Item 2. Inservice Inspection Program

Generic Letter 88-01 requests on page 3:

"Your current plans regarding pipe replacement and/or other measures taken or to be taken to mitigate IGSCC and provide assurance of continued long-term integrity and reliability."

"An Inservice Inspection Program to be implemented at the next refueling outage for austenitic stainless steel piping covered under the scope of this letter that conforms to the staff positions on inspection schedules methods and personnel, and sample expansion included in this letter."

The information pertaining to the pipe replacement and other mitigating actions as well as the Inservice Inspection Program provided in most of the licensee submittals were either incomplete or did not provide the background data that is needed to evaluate the ISI Program such as (1) reasons/justification for IGSCC classification of welds, (2) methods, personnel qualification, schedules and identities of welds inspected, and (3) results of previous inspections, and/or identities of welds to be inspected during future inspections.

Thus, the following information is requested:

1. A listing of all welds by system, pipe size, configuration (e.g., pipe to elbow, pipe to valve, etc.), drawing number (piping ISO with weld I.D.), location (i.e., inside or outside of containment, etc.), weld I.D. number, and IGSCC classification (i.e., IGSCC Category A, B, C, D, E, F and G).
2. Reason/justification for the classification of each weld, using such information as (a) weld history such as heat sink welding (HSW), (b) pipe and weld metal compositions or material identities to show either conforming material or non-conforming material, (c) mitigating treatment(s) applied such as solution heat treating (SHT), stress improvement (IHSI or MSIP).
3. Identity of welds to be inspected during past and future refueling outage. Include (a) dates and results of previous inspections, (b) flaw characteristics including orientation (axial or circumferential), maximum length, maximum depth, repairs and/or mitigating treatments applied.

Please supply this information in tabular form using formats such as that illustrated in Tables 2 and 3.

Table 2

History of Welds and Prior Mitigating Actions/Treatments*

IGSCC Categ	System	Weld Number	Configuration	Dia. Inch	Material**			Treatment***				
					Casting Forging, Pipe	Weld		SHT	HWS	CRC	SI	O.L.

Notes:

- * List each weld separately, using one or more lines as required.
- ** For material: identify as non-conforming or conforming as appropriate concerning whether it conforms with the NRC Staff position on resistant materials. If conforming, identify the material type (e.g., Type 316 NG).
- *** For treatment: list "X" under appropriate column(s) if weld was treated using indicated technique, i.e., solution heat treated (SHT), heat sink welded (HSW), corrosion resistant clad (CRC), stress improved (SI), or overlaid (O.L.). For SI, add explanation of method used, i.e., whether by induction heating or mechanical, whether pre and/or post treatment inspection was applied using methods and personnel qualified under NRC/EPRI/BWROG coordination plan, and whether treatment was applied within two years of service date. Also add explanation and justification of any overlays that were not standard (per NRC Staff position).

Table 3

Inspection Schedules

IGSCC Categ	System	Weld No.	Dia. Inch.	Configuration	Inspected/To Be Inspected/Flaws Found			
					Past		Future	
				R.O.#X-2	R.O.#X-1	Flaw	R.O.#X	R.O.#X+1

Instructions:

1. Under the heading, "Inspected/To BE Inspected," use as many columns as required to describe the following:

(a) All previous inspections that were conducted (per NUREG 0313, Revision 2, page 5.2) using methods and personnel qualified under NRC/EPRI/BWROG coordination plan as upgraded in September, 1985.

plus

(b) A sufficient number of future inspections to demonstrate that the schedules will follow the NRC Staff positions as given in Table 1 in Generic Letter 88-01.

2. Replace R.O.# (X-2, X-1, X, X+1) with actual refueling outage numbers. Indicate dates inspections were/will be performed.
3. List each weld within the scope of Generic Letter 88-01.
4. Place an "X" or other appropriate symbol under the appropriate column for each refueling outage for which that weld was inspected or will be inspected.
5. Indicate with "yes" under column marked "flaw" if a flaw indication was found. Attach a statement for each flawed weld giving the orientation (axial or circumferential), the dimensions (maximum length and depth), and describing any repairs made.

Item 3. Welds Covered in Licensee Submittal

Generic Letter 88-01 (on page 2) states:

"This Generic Letter applies to all BWR piping made of austenitic stainless steel that is four inches or larger in nominal diameter and contains reactor coolant at a temperature above 200°F during power operation regardless of Code classification. It also applies to reactor vessel attachments and appurtenances such as jet pump instrumentation penetration assemblies and head spray and vent components."

Were any welds that fall within this defined scope excluded from the licensee submittal (for example, welds in the RWCU outboard of the isolation valves)? If previously excluded, please list identity of such welds and plans for mitigation and inspections in Tables 2 and 3 or provide alternative proposal. If IGSCC susceptible welds were excluded from the licensee submittal based on temperature considerations please identify the welds and describe in detail the method of temperature measurements.

Item 4. Welds that Are Not UT Inspectable

Generic Letter 88-01 (in Table 1) states: "Welds that are not UT inspectable should be replaced, "sleeved", or local leak detection applied. RT examination or visual inspection for leakage may also be considered."

Does the licensee submittal include discussions and plans for:

- (a) All welds that are inaccessible for UT inspections?
- (b) All welds that are only partially accessible for UT inspections?
- (c) Welds that cannot be UT inspected because of geometrical constraints or other reasons.

If not, please list these welds and plans for mitigation/inspection.

Item 5. Leakage Detection

Generic Letter 88-01 states on page 3:

"Confirmation of you plans to ensure that the Technical

Specification related to leakage detection will be in conformance with the staff position on leak detection included in this letter."

The staff position is outlined on pages 5 and 6 of Generic Letter 88-01 and include the following items:

1. Leakage detection should be in conformance with Position C of Regulatory Guide 1.45 "Reactor Coolant Pressure Boundary Leakage Detection Systems," or as otherwise approved by the NRC.
2. Plant shutdown should be initiated for corrective action when:
 - (a) within any 24 hour period any leakage detection system indicates an increase of unidentified leakage in excess of 2 gpm or its equivalent, or
 - (b) the total unidentified leakage attains a rate of 5 gpm or equivalent.
3. Leakage should be monitored (or determined from flow measurements if flow is continuously monitored) at approximately four hour intervals or less.
4. Unidentified leakage should include all leakage other than
 - (a) leakage into closed systems, or
 - (b) leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with operations of monitoring systems or not to be from a throughwall crack.
5. For plants operating with any IGSCC Category D, E, F, or G welds, at least one of the leakage measurement instruments associated with each sump shall be operable, and the outage time for inoperable instruments shall be limited to 24 hours or immediately initiate an orderly shutdown.

Although most licensee submittals describe the intention of meeting some or all of these requirements or offer alternative measures, it is not always clear whether these requirements are contained in the Technical Specifications. Thus it is requested that this information should be provided by each licensee. For clarity and completeness, please use a checklist such as that illustrated in Table 4.

Table 4

Licensee Positions on Leakage Detection

<u>Position</u>	<u>Already Contained in TS</u>	<u>TS will be Changed to Include</u>	<u>Alternate Position Proposed</u>
1. Conforms with Position C of Regulatory Guide 1.45			
2. Plant shutdown should be initiated when:			
(a) within any period of 24 hours or less, an increase is indicated in the rate of unidentified leakage in excess of 2 gpm, or			
(b) the total unidentified leakage attains a rate of 5 gpm.			
3. Leakage monitored at four hour intervals or less.			
4. Unidentified leakage includes all except:			
(a) leakage into closed systems, or			
(b) leakage into the containment atmosphere from sources that are located, do not interfere with monitoring systems, or not from throughwall crack.			
5. Provisions for shutdown within 24 hours due to inoperable measurement instruments in plants with Category D, E, F, or G welds.			

Instructions:

Place "X" or "yes" under appropriate column for each item. Provide description and justification for alternative positions if not already provided.

ATTACHMENT A

REQUEST FOR ADDITIONAL INFORMATION
PERTAINING TO DRESDEN STATION, UNIT 3

Item 1. Leakage Detection

In responding to Item 5 of the Enclosure please provide the following information: The licensee submittal (on page 7) refers to other methods of leakage measurements (stating that "Sump operability is defined by the station as the ability to measure reactor coolant leakage rather than strictly depending on the operability of a leakage measurement instrument), but no description of the methods or accuracy of these methods was provided. Please supply this information.

ATTACHMENT B

REQUEST FOR ADDITIONAL INFORMATION
PERTAINING TO QUAD CITIES, UNITS 1 AND 2

Item 1. Leakage Detection

In responding to Item 5 of the Enclosure please also provide the following information:

In reference to Quad Cities, Unit 1, the Commonwealth Edison Submittal states (on page 19):

"Sump operability is defined by the station as the ability to measure reactor coolant leakage rather than strictly depending on the operability of a leakage measurement instrument."

A similar statement appears on page 23 of the Commonwealth Edison Submittal in reference to Quad Cities, Unit 2.

Please describe the alternate method(s) for measuring leakage that are inferred in that statement.