



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 17, 1990

Dr. Thomas E. Murley
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTN: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 2
IGSCC Inspection Plan for the
Fall 1990 Refueling Outage
NRC Docket No. 50-237

Reference: B. Siegel (NRC) letter to T. Kovach
(CECo), dated August 23, 1990, Review
of Response to Generic Letter 88-01
for Dresden Station Units 2 and 3.

Dr. Murley:

The purpose of this letter is to transmit the Dresden Unit 2 Fall 1990 refueling outage inspection plan for piping susceptible to intergranular stress corrosion cracking (IGSCC).

Attachment 'A' presents the inspection plan for Dresden Unit 2. The inspection plan updates the weld population for Unit 2 by adding recently identified welds and incorporating weld reclassifications. The inspection plan does not take any credit for hydrogen water chemistry, and does not include any welds in the Reactor Water Cleanup (RWCU) System which are located outboard of the isolation valves.

Commonwealth Edison Company (CECo) recently received the referenced letter from the Nuclear Regulatory Commission (NRC), which transmitted the NRC's safety evaluation of Generic Letter 88-01 (NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping) for Dresden Station Units 2 and 3. In that letter, the NRC requested CECo to modify the Inservice Inspection (ISI) Program to address the RWCU System piping outboard of the isolation valves, and to propose Technical Specification amendments (relating to the inspection and leakage detection positions presented in Generic Letter 88-01) for each unit.

CECo is currently evaluating the impact of incorporating the RWCU System piping outboard of the isolation valves into the ISI Program for Units 2 and 3. It is expected that this evaluation will be completed during the first quarter of 1991. At that time, CECo will inform the NRC of our plans for the subject RWCU piping (for both units).

9009210284 900917
PDR ADOCK 05000237
Q PDC

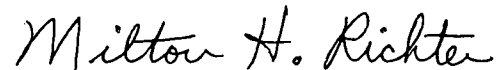
A001
1/1

September 17, 1990

CECo is also currently reviewing the recommended Technical Specification amendments requested in the referenced letter. At this time, it is expected that CECo will propose Technical Specification amendments for Dresden Station (Units 2 and 3) by December 31, 1990.

Please direct any questions or comments on this letter to this office.

Respectfully,



M.H. Richter
Nuclear Licensing Administrator

Attachment A - Dresden Unit 2 Plan for IGSCC
Related Activities - Fall 1990
Refueling Outage

cc: A.B. Davis - Regional Administrator, Region III
B.L. Siegel - Project Manager, NRR
S. DuPont - Senior Resident Inspector, Dresden

1mw/ID244

ATTACHMENT A

DRESDEN UNIT 2 PLAN FOR IGSCC RELATED ACTIVITIES FALL 1990 REFUELING OUTAGE

1. Table 1 for Dresden Unit 2 provides the inspection plan for the Fall 1990 refueling outage (D2R12) to address Intergranular Stress Corrosion Cracking (IGSCC) concerns. The plan also addresses the CECO commitment made in a letter dated March 1, 1989 to the U.S. NRC (inspection of 2 Recirculation Bypass welds SPM-45-25 and SPM-45-19; see item 5.b. below).
2. Ultrasonic examination of austenitic stainless steel piping welds will be performed by Level II or III examiners qualified by EPRI after September 10, 1985. Examination of overlay repaired welds will be performed by Level II or III examiners qualified by EPRI to examine overlay repaired welds using the EPRI technique. Automated ultrasonic examination may be utilized on both piping and overlay repaired welds.
3. If IGSCC flaw indications are identified, they will be resolved consistent with the intent of Generic Letter 88-01. If repairs are required, weld overlays may be utilized which will take into account flaw characterization, depth, length, and material toughness.
4. Twelve (12) leak barrier weld overlays, which were applied during the previous refueling outage (D2R11) in 1988, will be built up to standard weld overlays.
5. Table 1 for Dresden Unit 2 also provides the updated stainless steel weld population. The following changes are reflected in the table.
 - a. The addition of eight (8) CRD cap welds to the category A weld population. These welds, which are 7.5" in diameter (OD), are considered as category A welds because their base material and weld material are Inconel 600 and Inconel 82, respectively.

The cap welds are required to seal off 8 extra CRD housing penetrations on the bottom head. The existence of these CRD housing penetrations was discovered recently by a record search, which was performed to support the update of the plant's ISI program for the next inspection interval.

Figure 1 shows the cross sectional view of a typical CRD cap weld.

- b. Reclassification of two (2) 4" Recirculation Bypass welds as 4"/category G welds. These 2 welds were previously classified as 4"/category A welds (as discussed previously in a CECO letter to the U.S. NRC dated March 1, 1989).
- c. The addition of two (2) 12" class 2 Isolation Condenser (ISCO) Supply welds to the category G weld population. The existence of these 2 Safe end-to-Nozzle welds was discovered recently by a record search being performed to support the update of the plant's ISI program for the next inspection interval.
- d. The addition of two (2) High Pressure Coolant Injection (HPCI) welds to the category G weld population. The record search being performed to support the update of the ISI program for the next interval indicated that the HPCI Steam Supply Safe end is made of non-conforming stainless steel. Consequently, the Nozzle-to-Safe end and Safe end-to-Elbow welds are non-conforming.
- e. The addition of eight (8) Core Spray welds to the category A weld population. These welds join carbon steel piping to cast stainless steel valve bodies.

TABLE 1
DRESDEN UNIT 2
GENERIC LETTER 88-01 INSPECTION PLAN
FALL 1990 (D2R12)

SYSTEM	SIZE	TOTAL	CATEGORIES							REMARKS	
			A	B	C	D	E	F	G		
RECIRCULATION											
Outlets	28"	33	2	0	10	20	0	1	0	0	1 unrepaired weld in Cat. F 1 Leak Barrier Weld Overlay (LBWOL). 7 LBWOL, 1 unrepaired weld overlay (WOL), 1 unprepped/uninspected WOL.
Noz-SE	28"	2	0	0	1	1	0	0	0	0	
Header	22"	18	8	0	2	6	1	1	0	0	
Risers	12"	40	0	0	9	12	10	9	0	0	
Noz-SE	12"	10	0	0	7	3	0	0	0	0	
Bypass	4"	28	7	0	0	19	0	0	0	2	
RHR											
LPCI	16"	25	0	0	20	5	0	0	0	0	
SDC	16"	8	2	0	0	6	0	0	0	0	
ISOLATION CONDENSER											
Supply	14"	26	0	0	21	4	0	0	0	1	1 inaccessible category G weld.
Supply	12"	17	0	0	15	0	0	0	0	2	
Return	12"	14	0	0	12	0	0	0	0	2	2 inaccessible category G welds.
HPCI STEAM SUPPLY	14"	2	0	0	0	0	0	0	0	2	
CORE SPRAY	10"	14	14	0	0	0	0	0	0	0	
JET PUMP INST.	12"	4	0	0	2	2	0	0	0	0	
	8"	2	0	0	1	1	0	0	0	0	
	4"	4	0	0	2	2	0	0	0	0	
RWCU	8"	28	17	0	0	1	2	7	1	1	1 inaccessible category G weld, 7 LBWOL or uninspected WOL.
CRD BOTTOM PENETRATION CAP	7.5"	8	8	0	0	0	0	0	0	0	
CRD	4"	6	0	0	0	6	0	0	0	0	
N-18 A,B NOZZLES	6"	4	4	0	0	0	0	0	0	0	
HEAD VENT	4"	3	2	0	0	1	0	0	0	0	
POPULATION		296	64	0	102	89	13	18	10		
GL 88-01 MIN. REQUIREMENTS			4.16%		16.7%	50%	50%	100%	100%		
Next Outage Inspection Sample (D2R12, scheduled to start 9/90)		113	2	0	53	34 (1)	0 (2)	18	6		Inspection sample does not take credit for HWC.

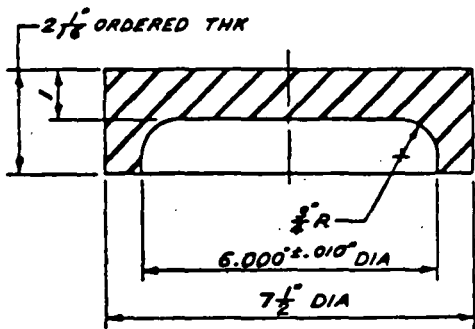
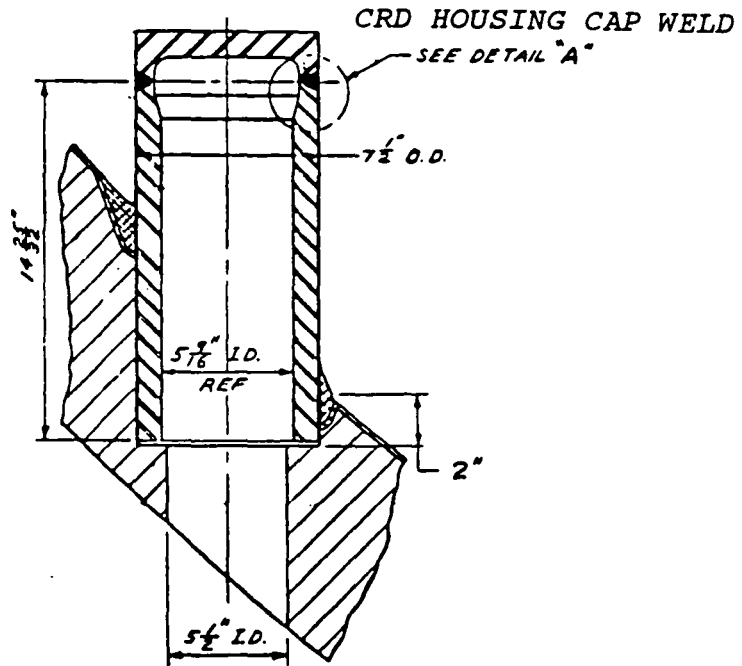
NOTES:

(1) All welds that were not examined during the previous refueling outage in 1988 (D2R11).

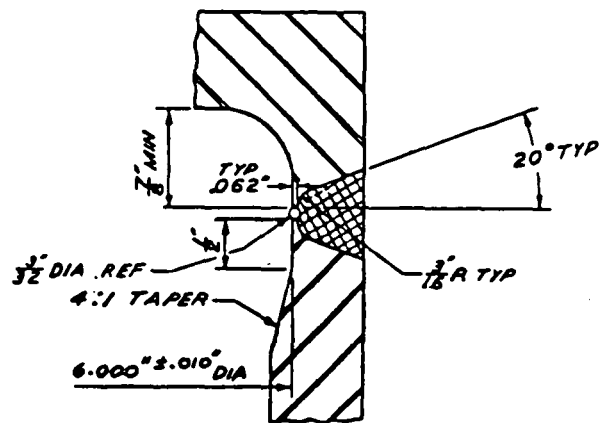
(2) All welds were examined during the previous refueling outage in 1988 (D2R11).

FIGURE 1

TYPICAL CRD HOUSING CAP WELD



CAP



DETAIL A