

CATEGORY 1

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AUTH.NAME AUTHOR AFFILIATION
FITZPATRICK, E. Illinois Power Co.
RECIP.NAME RECIPIENT AFFILIATION
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SUBJECT: Requests approval IAW 10CFR50.55(a)(3) to use alternative rules of ASME Section IX Code Cases 2142-1 & 2143-1 in lieu of requirements of 10CFR50.55a(c) for purpose of welding procedure & performance qualification.

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Indiana Michigan
Power Company
500 Circle Drive
Buchanan, MI 49107 1395



INDIANA
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April 3, 1998

AEP:NRC:0980Z

Docket No.: 50-315

U.S. Nuclear Regulatory Commission
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Gentlemen:

Donald C. Cook Nuclear Plant Unit 1
USE OF ASME SECTION IX CODE CASES 2142-1 AND 2143-1

Reference: Letter, Robert A. Capra, NRC, to Irene M. Johnson, Commonwealth Edison Company, "USE OF ASME CODE, SECTION IX, CODE CASES 2142-1 AND 3143-1, BYRON STATION, UNIT 1, AND BRAIDWOOD STATION, UNIT 1 (TAC NOS. M97495 AND M97496)", dated June 1, 1997

Approval is requested in accordance with 10 CFR 50.55a(a)(3) to use the alternative rules of the American Society of Mechanical Engineers (ASME) Section IX Code Cases 2142-1 and 2143-1 in lieu of the requirements of 10 CFR 50.55a(c), for the purpose of welding procedure and performance qualification. The use of these code cases was previously approved for use at the Byron and Braidwood stations (see reference).

The use of Alloy 690 type filler materials is necessary in the fabrication and installation of Cook Nuclear Plant unit 1 replacement steam generator lower assemblies. Weld filler materials that will be utilized for these applications are UNS W86152, matching shielded metal arc welding electrode for Alloy 690, and UNS N06052, the companion solid wire filler metal used for gas metal arc and gas tungsten arc welding processes. The materials are classified as F-No. 43 for weld procedure and performance qualification and will be procured in accordance with a nuclear grade procurement program.

Industry studies have shown the Alloy 690 materials to have superior corrosion resistance when compared to Alloy 600 that was used in older steam generators. The use of UNS W86152 and UNS N06052 weld materials is preferred in order to match the corrosion resistance of the Alloy 690 base metal for welding applications, and have been used on several different steam generator fabrication and installation projects. The weld materials provide an acceptable level of quality and safety because of their superior corrosion resistant properties; therefore, the requirements of 10 CFR 50.55a(a)(3)(i) are satisfied. Using these code cases permits the use of a large number of existing welding procedures and performance qualifications, eliminating the burden of separate welding procedures for non-code welding materials; therefore, the requirements of 10 CFR 50.55(a)(3)(ii) are satisfied.

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Fabrication of the unit 1 replacement lower assemblies has been proceeding at a pace to meet a delivery of the first assembly in the fall of 1999. To maintain our fabrication schedule, we request approval to use code cases 2142-1 and 2143-1 by May.29, 1998, prior to installation of the first unit's divider plate in the channel head.

Sincerely,



E. E. Fitzpatrick
Vice President

/vlb

c: J. A. Abramson
A. B. Beach
MDEQ - DW &RPD
NRC Resident Inspector
J. R. Sampson