

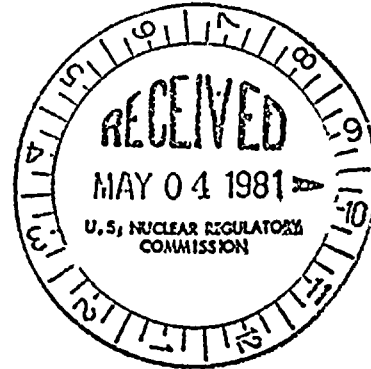
PP&L

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APR 20 1981

Mr. Boyce H. Grier, Director
 Region I
 U.S. Nuclear Regulatory Commission
 631 Park Avenue
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SUSQUEHANNA STEAM ELECTRIC STATION
 IE BULLETIN 80-13
 ER 100450 FILE 842-3
 PLA-712

DOCKET NOS. 50-387
 AND 50-388

Dear Mr. Grier:

The following information is provided in response to IE Bulletin 80-13, "Cracking in Core Spray Spargers", as justification for exemption from the requirements of the bulletin,

It is reported in IE Bulletin 80-13 that 2 BWR units, Oyster Creek and Pilgrim, have developed cracking in this piping. Of at least 19 other plants inspected, none have observed similar cracking.

As stated in the bulletin, the mode of the cracking is apparently intergranular stress corrosion cracking (IGSCC), caused in part by sensitization.

The bulletin requires that inspections of the core spray spargers and piping that connects the spargers to the inlet nozzles be performed at every refueling outage until further notice.

In view of the material requirements of NUREG 0313, particularly the carbon content of Type 304 Stainless steel, PP&L requested from General Electric the carbon contents of the cracked piping. GE reported that the spargers at Oyster Creek have contents of .05% to .06%, and Pilgrim has .048%. These carbon levels are typical of regular grade Type 304 stainless steel. An examination of the certified test reports revealed that Susquehanna's core spray spargers were fabricated from Type 304L, and the actual carbon content is very low at .020%. The connecting piping is also Type 304L.

In addition to NUREG 0313, numerous other sources acknowledge the far greater resistance to sensitization, and hence IGSCC of Type 304L versus regular Type 304 stainless steel.



Mr. Boyce H. Grier

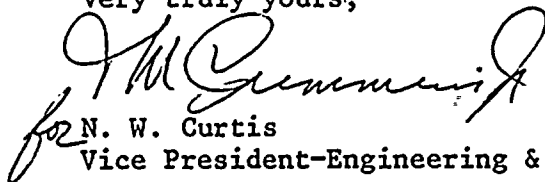
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PP&L believes that in view of the high radiation levels expected during the inspections and the use of Type 304L material, valid reasons exist at Susquehanna for an exemption of the inspections required by IE Bulletin 80-13.

PP&L has also learned that a crack or an indication was found on a reducing Tee fitting in the line between the core spray inlet nozzle and the core spray header at Oyster Creek. General Electric is presently trying to determine for PP&L if this fitting is regular Type 304 or 304L. If this Oyster Creek fitting is determined to be 304L, PP&L will conduct inspections on the corresponding fittings at Susquehanna in accordance with the bulletin.

Very truly yours,


for N. W. Curtis

Vice President-Engineering & Construction-Nuclear

RMH/mjm

cc: Director
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