

Vepco

VIRGINIA ELECTRIC AND POWER COMPANY, RICHMOND, VIRGINIA 23261

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Mr. Richard Snaider
Generic Issues Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Serial No. 943
PSE&C/MBS:WANG/VML
Docket Nos. 50-280
50-281
50-338
50-339

License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Dear Mr. Snaider:

Vepco has reviewed NUREG-0577 "Potential for Low Fracture Toughness and Lamellar Tearing on PWR Steam Generator and Reactor Coolant Pump Supports" dated October 1979, and the enclosure to NRC letters of May 19, 1980 and May 20, 1980 which dealt with implementation of a proposed review procedure based on NUREG-0577. We have the following comments on NUREG-0577 and the review procedure entitled, "General Operating Reactor Review Procedure and Acceptance Criteria". These comments supplement the comments of our letter dated July 21, 1980.

- 1) It is proposed by Vepco that the NRC allow the use of temperature measurements of supports as an option to demonstrate the integrity of the support structure. Temperature measurements would be taken at applicable support locations and acceptance would be based on the temperature criteria shown in Table 4.4 for $NDT + 1.3\sigma$ plus the required temperature adjustment of Figure 1 of the review procedure. It is proposed that the temperature measurements be taken under normal plant operating conditions during winter months or be extrapolated to winter temperature conditions (i.e. coldest expected temperature).
- (2) Vepco also proposes that the mill certification of certain materials be considered as the basis to allow the reclassification of the material where the chemical and mechanical properties of that material would warrant such a reclassification. This would allow for circumstances where the chemical and mechanical properties range of one material specification

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overlap with another, and therefore material produced to one specification could meet the criteria of a higher grade material specification. For example, a material classified as plain carbon steel, with the manganese content in the upper part of the allowable range may meet all of the requirements for a material classified as carbon manganese steel. Such a material with a high manganese to carbon ratio would exhibit better toughness than a normal plain carbon steel. As shown in Table 4.4 of NUREG-0577 there is a significant difference in the NDT + 1.3 σ value for plain carbon steel and carbon manganese steel. Therefore, allowing reclassification of a steel sold as plain carbon but produced with a high manganese to carbon ratio would allow a more realistic NDT + 1.3 σ value for that steel.

Very truly yours,



B. R. Sylvia
Manager - Nuclear Operations
and Maintenance