



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

TIC  
TEBA

JUN 27 1979

Docket No. 50-456  
Docket No. 50-457

Commonwealth Edison Company  
ATTN: Mr. Byron Lee, Jr.  
Vice President  
P. O. Box 767  
Chicago, IL 60690

Gentlemen:

Thank you for your letter dated May 23, 1979, and the interpretation of the ASME Code Committee. We have concluded the matter does not appear to involve noncompliance and we will revise our records accordingly.

While we accept the interpretation offered you by the Code Committee, we recognize that fitup requirements are critical to the quality of a weld. Accordingly, we will inspect your actions governing this control during future inspection.

Your cooperation with us is appreciated.

Sincerely,

G. Fiorelli, Chief  
Reactor Construction and  
Engineering Support Branch

cc: Mr. R. Cosaro, Project  
Superintendent

cc w/ltr dtd 5/23/79:  
Central Files  
Reproduction Unit NRC 20b  
PDR  
Local PDR  
NSIC  
TIC  
Mr. Dean Hansell, Office of  
Assistant Attorney General

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Commonwealth Edison  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

May 23, 1979

Mr. James G. Keppler, Director  
Directorate of Inspection and  
Enforcement - Region III  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Subject: Braidwood Station Units 1 and 2  
Additional Response to IE Inspection  
Report Nos. 50-456/79-01 and 50-457/79-01  
NRC Docket Nos. 50-456 and 50-457

Reference (a). March 19, 1979 letter from C. Reed to  
James G. Keppler

Dear Mr. Keppler:

Per Reference (a), Commonwealth Edison Company requested that the NRC place an item of noncompliance in abeyance until Commonwealth Edison received a response on a code inquiry to the American Society of Mechanical Engineers (ASME) Committee. Your March 28, 1979 letter concurred.

Enclosed for your review as Attachment 1 is the ASME response to Commonwealth Edison's inquiry regarding your apparent noncompliance on welding of split backing rings. Also enclosed, as Attachment 2, is Commonwealth Edison's inquiry of the subject matter.

Since the ASME response supports Commonwealth Edison's contention that only performance qualification using a split backing ring is required to qualify for welding such joints in construction, Commonwealth Edison requests that the NRC reexamine this apparent item of noncompliance and consider changing this infraction to an observation.

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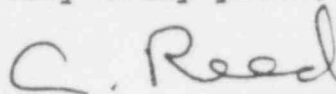
Mr. James G. Keppler:

- 2 -

May 23, 1979

Please address any additional questions that you might have to this office.

Very truly yours,



Cordell Reed  
Assistant Vice-President

attachments

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ATTACHMENT 1



The American Society of Mechanical Engineers

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THE BOILER AND  
PRESSURE VESSEL  
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W. E. SOMERS

April 30, 1979

Mr. W. L. Stiede  
Commonwealth Edison  
P. O. Box 767  
Chicago, IL 60690

SUBJECT: Section IX, Regarding the Welding of Split Backing Rings,  
QW-402.2, QW-402.4

REFERENCE: Your Letter of March 13, 1979

ITEM: BC-79-187

Dear Mr. Stiede:

Our understanding of the question in your inquiry and our interpretive reply is as follows:

Inquiry:

If a welder is qualified to weld using a split backing ring, must he be additionally qualified to weld a joint without backing to weld the gap of a split backing ring?

Reply:

No.

Very truly yours,

*Joseph S. Brzuszkiewicz*

Joseph S. Brzuszkiewicz  
Assistant Secretary  
Boiler and Pressure Vessel Committee

/rdp

421-356

March 13, 1979

Mr. G. M. Eisenberg, Secretary  
Boiler & Pressure Vessel Committee  
c/o The American Society  
of Mechanical Engineers  
345 E. 47th Street  
New York, NY 10017

Dear Mr. Eisenberg:

We are in urgent need of an interpretation of ASME Boiler and Pressure Vessel Code rules involving the welding of butt joints in piping employing a split backing ring. During a recent inspection at one of our nuclear plant construction sites by Nuclear Regulatory Commission personnel, we were cited as follows:

"One apparent item of noncompliance was identified in one area. Infraction--failure of the welders who welded the gap of the split backing ring--to be qualified to weld the gap of the split backing ring. Welding of the split ring constitutes welding without backing."

The NRC personnel are apparently of the opinion that welding across the short gap which can exist on weld joints using commercial backing rings constitutes open root welding (i.e., welding without a backing ring). We do not agree and are of the opinion that ASME Boiler and Pressure Vessel Code rules only require performance qualification using a split backing ring to qualify for welding such joints in construction. The joints involved are Section III, Class 3 welds.

The following inquiry is submitted to clarify the question raised by the above situation.

INQUIRY: If a welder is qualified to the rules of Section XI on a butt joint using a split backing ring, must he be additionally qualified on a butt joint with no backing to make construction welds employing split backing rings. In both the qualification test and construction welds, there is a gap between the split ends.

A prompt response to this inquiry will be appreciated.

Very truly yours,

*W. L. Stiede*

W. L. Stiede

cc: R. C. Griffin  
R. F. Reedy  
L. J. Christensen  
E. J. Hemzy

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