



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

May 23, 1979

TERA

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,

A handwritten signature in cursive script, appearing to read "C. Reed".

Cordell Reed
Assistant Vice-President

attachments

2281 018



ATTACHMENT 1

The American Society of Mechanical Engineers

United Engineering Center • 345 E. 47th St., New York, N.Y. 10017 • 212-644-7722 • TWX-710-081-0267

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PRESSURE VESSEL
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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

2281 019

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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