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August 5, 1980

EF2 - 49,278

Mr. James G. Keppler  
Regional Director  
Directorate of Regulatory Operations  
Region III  
U. S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Reference: 1. Enrico Fermi Power Plant - Unit 2  
2. USNRC Licensing Docket 50-341  
3. EF2 - 33,247 dated March 24, 1976

Subject: Application of Later Code Requirements to the Construction of Safety Related Piping Systems

Dear Mr. Keppler:

As indicated in Reference 3, the public Safety Related Piping Systems on Fermi 2 are designed, constructed and tested in accordance with the ASME Boiler and Pressure Code, Section III, 1971 Edition including Addenda thru the Winter 1971. That Code Edition does not specifically address the subject of welding of permanent structural attachments (lugs, trunnions, saddles, etc.) to piping systems after conduct of the System Hydrostatic Test.

The subject of welding permanent structural attachments to piping after it has been hydrostatically tested was first addressed in the Summer 1976 Addenda to the ASME III Code, when Subsections NB, NC, ND-4436 were added.

Subsections NB, NC, ND specify definitive requirements which must be adhered to when welding structural attachments to pressure boundaries subsequent to the conduct of the hydrostatic test. These include limitations on weld and attachment size and the definition of specific examination requirements. There are no supplemental requirements external to the text of Subsections NB, NC, ND-4436 which must be adhered to in applying that subsection.

Edison has reviewed Subsections NB, NC, ND-4436 and determined that as long as all the supplemental and/or restrictive requirements incumbent in the subsection are adhered to, there would be no reduction in conservatism if this subsection were applied to the

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construction of piping systems designed in accordance with the 1971 Edition of the Code. We have reviewed the above with our Authorized Nuclear Inspector, and have received his concurrence.

Please be advised that Edison intends to apply the rules of Sub-section NB-4436, as stated in the Summer 1976 Addenda to the ASME Code, to the construction of Safety Related Piping Systems on Fermi 2.

Please also note that this letter does not constitute a waiver application, but is merely intended to keep you informed of our activities.

Should you require further information, please advise us.

Yours very truly,

*W. J. Fahrner*

W. J. Fahrner, Manager  
Enrico Fermi 2

9/4/80  
WJF/JHC/op

cc: Mr. Victor Stello, Jr., Director  
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