

August 4, 1980

Mr. J. G. Keppler, Regional Director Office of Inspection and Enforcement, Region III U. S. NUCLEAR REGULATORY COMMISSION 799 Roosevelt Road Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKETS 50-266 AND 50-301
POTENTIAL WELDING DEFECTS IN TANKS MANUFACTURED
BY GRAVER TANK AND MANUFACTURING COMPANY
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This is in response to a letter dated July 8, 1980, from Mr. Norman C. Moseley, Director, Division of Operations Inspection, Office of Inspection and Enforcement, which was directed to no specific addressee in our Company, and which was received in our office July 15, 1980. The letter requests that we determine if the weldments in safety-related tanks fabricated by Graver Tank and Manufacturing Company at Point Beach Units 1 and 2 meet design specifications and fabrication requirements.

The only safety-related tanks at Point Beach Units 1 and 2 fabricated by Graver are the refueling water storage tanks (RWST). One RWST is installed for each unit. Each tank contains ten pipe connections or penetrations having weldment designs similar to the configuration addressed in Mr. Moseley's letter and Enclosure 1 attached thereto. The Point Beach tank penetrations are as follows:

One 20-inch manway

One 16-inch process pipe connection

One 10-inch overflow connection

Six 5-inch immersion heater connections

One 4-inch spare pipe connection.

In the absence of other applicable standards at the time of fabrication, the tanks were fabricated in accordance with American Petroleum Institute (API) Standard 650. API 650 specified visual inspection of fillet welds and did not require radiographic examination or sectioning of appurtenance weldments.

At the present time we have inspected the Unit 1 16-inch process pipe connection. The configuration of this weldment is shown in Attachment A. (The configuration of the internal pipe to tank weldment could not be determined by this inspection.) Ultrasonic inspection verified that the reinforcing pad to pipe weld is a full penetration weld. The reinforcing pad to shell weld was verified by visual inspection. Ultrasonic inspection of the remaining pipe connections and penetrations and sample inspections of seam welds will be performed during the next refueling for each unit. Should welds be found which are not in accordance with design specifications, they will be repaired if necessary to assure the capability to withstand design loading conditions.

We have reviewed documentation for these tanks and have been unable to identify specific weld inspection documentation by an independent inspector. Therefore, we have evaluated the above penetrations and piping connections assuming the "as found" weldment configuration in Enclosure 1 of Mr. Moseley's letter. These evaluations show that the connections and penetrations would withstand design loading conditions assuming this configuration.

Should you have questions concerning this response, please contact us.

Very truly yours,

Executive Vice President

Sol Burstein

Enclosure

Subscribed and sworn to before me This Fourth day of August, 1980.

Notary Public, State of Wisconsin

My Commission expires July 1, 1984.

Copy to: NRC Resident Inspector
Point Beach Nuclear Plant

## "As-Found" Condition

