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Consumers Power Company

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September 10, 1975

Division of Reactor Licensing US Nuclear Regulatory Commission Washington, DC 20555

DOCKET 50-155, LICENSE DPR-6 BIG ROCK POINT PLANT

On February 24, 1975 Consumers Power Company transmitted an Abnormal Occurrence Report (AO-75-7) describing an event involving discovery of a defect in the Big Rock Point emergency condenser outlet pipe. On April 18, 1975 we transmitted a report of the results of the metalographical examination that was performed to determine the cause of the defect. We stated at that time that the examination revealed that the defect was a "seam" with the depth less than 5% of wall thickness and that the material in its present state meets chemical, tensile and flattening requirements of ASTM Specification A-106.

Discussions since that time have revealed that, taking a conservative view, the minimum wall criterion in the specification (A-106 Grade E) may have been violated. This letter is submitted to clarify the docketed record.

ASTM Specification A-106 Grade B contains no requirement on out of roundness. Dimensions are specified in terms of outside diameter and wall thickness. The applicable nominal wall thickness is 0.438 inch (schedule 120 four-inch pipe). The minimum acceptable wall thickness is 0.383 inch (12.5% below nominal). The examination indicated a minimum wall (without considering the seam) of 0.385 inch and a maximum of 0.459 inch due to eccentricity in the pipe. When the seam depth (20 to 30 mils) is superimposed upon the thinned wall, a rejectable condition exists and replacement or repair is mandatory. The inspector believes the seam exists at the thinnest portion of the wall but cannot confirm it.

In addition, the laboratory was to receive a portion of the cutout area with the deepest penetration, but this cannot be confirmed either. Thus, the approximate 5% penetration reported April 18, 1975 may not be the maximum.

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We have concluded that the corrective action taken and reported remains adequate. The affected length of piping was replaced. The defect was analyzed to be a seam introduced during manufacturing of the piping rather than during service. Thus, there is no indication that a generic condition exists in this piping run or other piping runs in the plant. A significant portion of this run was inspected and no injurious surface defects were reported. All evidence points to the defect being an isolated seam produced during manufacture rather than in service.

Rayt & Derver

Ralph B. Sewell Nuclear Licensing Administrator

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