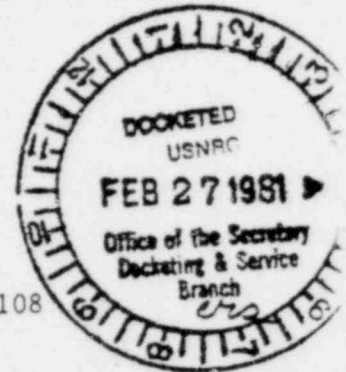


Veeco

DOCKET NUMBER
PROPOSED BILL **PR-50 (13)**
App G + H - Fracture Toughness
VIRGINIA ELECTRIC AND POWER COMPANY, RICHMOND, VIRGINIA 23261
(45 FR 75536)

February 13, 1981



Serial No. 108

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Docketing and Service Branch

Comments on Proposed Modifications to 10 CFR-Part 50, Appendix G and Appendix H

Veeco has performed a generic review of the proposed changes to the subject appendices to 10 CFR, Part 50, and we have the following comments:

Appendix G - Fracture Toughness Requirements

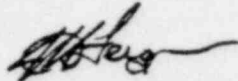
1. Section II, Definitions, G, "Beltline region of reactor vessel"-The revised definition of Beltline material is unclear in the statement, "...to be considered in the selection of the most limiting material." To what extent, and with what tests is material in adjacent regions to be evaluated? Is it intended that surveillance specimens reflect such material?
2. Section IV, Fracture Toughness Requirements, A.4 - It is unclear whether the requirement for "RT_{NDT} + 60 F" is applicable to the entire reactor coolant pressure boundary or only the reactor pressure vessel.
3. Section IV, Fracture Toughness Requirements, B - From a review of ASTM E185-79, Table 1, it appears that the reference to adjusted temperature at end of life should be a change in temperature of 200 F rather than the specific value, 200 F. This clarification has considerable significance in determining the allowable shift from RT_{NDT} over the life of the vessel.

Appendix H. - Reactor Vessel Material - Surveillance Program Requirements

1. Section II, Surveillance Program Criteria, A - The expression "E < 1MeV" is apparently incorrect and should be E > 1MeV.

2. Section II, Surveillance Program Criteria, B.2 - The requirement to use the "...edition of E185 in effect on the date of capsule withdrawal..." requires modification. The latest edition of E185 is the 1979 edition and the proposed wording of Appendix H would limit the latest edition for use to E185-79. The specific edition of E185 to be used should therefore be stated. Because of potential reporting and contract problems, Vepco is opposed to a requirement to use any unspecified "latest" edition of this document.

Very truly yours,



J. H. Ferguson
Executive Vice President, Power