

Diamond Power Specialty Company

Babcock & Wilcox a McDermott company

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July 14, 1981

Mr. Herbert F. Conrad
Section Leader
Corrosion Engineering Section
Chemical Engineering Branch
Division of Engineering
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555



Dear Mr. Conrad:

Subject: May 13, 1981 Meeting Minutes
Dated June 10, 1981

Thank you for the copy of the minutes of our meeting in Bethesda. After returning from vacation, we've had a chance to review them and as a result, have the following comments.

One important area of our discussion which we expected to see in the minutes was a summary of the statements by the staff members present which stated that: All licensees which use insulation materials which can be easily contaminated are required to have procedures in place during construction and operation which will protect the insulation. The procedures mentioned included placing or keeping the removed insulation in protective bags or alternately creating a clean storage surface on which the insulation would be placed and then covered to protect it. This, I felt, was an important part of the discussion and should be included in your minutes, perhaps as point 2.

Although the NRC prohibits the use of sensitized stainless steel components by enforcement of RG 1.44 and Branch Position MTEB 5-1 (NUREG-0313) all austenitic stainless steel will suffer from stress corrosion cracking given the right conditions whether it is sensitized or not. Granted that the sensitized material has a higher potential, it remains our opinion that wicking type insulations significantly increase risk when applied to austenitic stainless steel. Therefore, wicking type materials should not be permitted, or insulation contamination checks should be required before re-application of removed insulation. This would be in keeping with the normal NRC position that materials practices, or designs which can be postulated to initiate a failure must not be permitted.

We remain firm in our opinion that the risk associated with wicking type insulation materials is high and from that standpoint the results of the meeting were disappointing.

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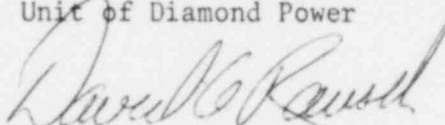
Diamond Power

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Page Two

We would appreciate receiving a copy of your revised minutes.

Sincerely,

MIRROR INSULATION
Unit of Diamond Power



David A. Rausch
Manager of Marketing

DAR:rm