April 26, 1982

Docket No. 50-219 LS05-82-04-074

> Mr. P. B. Fiedler Vice President & Director - Oyster Creek Oyster Creek Nuclear Generating Station Post Office Box 388 Forked River, New Jersey 08731

DISTRIBUTION Docket NRC PDR Local PDR ORB Reading 11711 NSIC DCrutchfiel HSmith RECEIVED JLombardo OELD MAY 1 1 1982 -OI&E VI, NUCLEAR RECULATORY COMMISSION ACRS (10 BOCOMENT REPLACEMENT BA SEPB DChaney

Dear Mr. Fiedler:

SUBJECT: INSERVICE INSPECTION REVIEW - REQUEST FOR ADDITIONAL INFORMATION

RE: Oyster Creek Nuclear Generating Station

The attached request for additional information relative to the inservice inspection program for the Oyster Creek facility is forwarded to you with a requested response date of thirty days after the receipt of this letter. A draft TER is scheduled to be completed on July 16, 1982 for Oyster Creek and prompt response is nacessary. To support this, please provide a copy of this response directly to:

> Dr. D. A. Outlaw Science Applications, Inc. 1710 Goodridge Drive McLean, Virginia 22102

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by

Dennis M. Crutchfield, Chief Operating Reactors Branch #5 Division of Licensing

SEO/ 1/1 DS4 USE(51)

Enclosure: Request for Additional Information

cc w/enclosure: See next page

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#### Mr. P. B. Fiedler

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April 26, 1982

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CC

G. F. Trowbridge, Esquire Shaw, Pittman, Potts and Trowbridge 1800 M Street, N. W. Washington, D. C. 20036

J. B. Lieberman, Esquire Berlack, Israels & Lieberman 26 Broadway New York, New York 10004

Ronald C. Haynes, Regional Administrator Nuclear Regulatory Commission, Region I 631 Park Avenue King of Prussia, Pennsylvania 19406

J., Knubel BWR Licensing Manager GPU Nuclear 100 Interplace Parkway Parsippany, New Jersey 07054

Deputy Attorney General State of New Jersey Department of Law and Public Safety 36 West State Street - CN 112 Trenton, New Jersey 08625

Mayor Lacey Township 818 Lacey Road Forked River, New Jersey 08731

U. S. Environmental Protection Agency Region II Office ATTN: Regional Radiation Representative 26 Federal Plaza New York, New York 10007

Licensing Supervisor Oyster Creek Nuclear Generating Station Post Office Box 388 Forked River, New Jersey 08731 Resident Inspector c/o U. S. NRC Post Office Box 445 Forked River, New Jersey 08731

Commissioner New Jersey Department of Energy 101 Commerce Street Newark, New Jersey 07102

## REQUEST FOR ADDITIONAL INFORMATION INSERVICE INSPECTION PROGRAM

Oyster Creek 1

- I. Requests for Relief from Code<sup>(1)</sup> Requirements, Class 1 Systems and Components as requested in the not's of Appendix 3A of Ref. 2
  - 1. Category B-G-1 and B-G-2 Items (pgs 3A-2, 4, 5, Ref. 2)

The extent of examinations proposed for pressure retaining bolting follows 1974 Code requirements. Note 5 requests relief from the pertinent provisions of the 1974 Code. Please clarify where relief from code requirements is necessary.

2. Notes 6, 7, 9 and 10 (pgs 3A-9, 10, Ref. 2)

These notes request relief from various provisions of the 1974 Code and instead, propose to perform the examinations as specified in later codes (1977 Code) up to and including the Summer 1978 Addenda<sup>(3)</sup>. Consideration should be given to updating to the Summer 1978 Addenda for the method of examination on each of the items for which relief has been requested. In these cases, relief would not be required.

II. Requests for Relief from Code Requirements, Class 2 Systems and Components, as requested in the notes of Appendix 3B of Ref. 2

1. Category C-D, Pg 3B-1, Reference 2

Note 2 of page 3B-2 requests relief from the 1974 Code requirement to examine all Class 2 bolting 1-inch-diameter and greater, citing that the Summer 1978 Addenda, Category C-D specification is for bolting which is greater than 2-inches-diameter. Consideration should be given to updating to the Summer 1978 Addenda for examination requirements. In this case, relief would not be required.

- III. Requests for Relief from Code Requirements for Class 1 and Class 2 Piping and Support Welds as requested in Appendix 3C of Ref. 2
  - 1. R1, Pg 3C-2, Reference 2

Relief is requested from the 1974 Code requirements to volumetrically examine integrally welded supports in Class 1 systems. This request is based

on a more up-to-date code specification for Category B-K-1 welds which allows volumetric or surface examinations as applicable. Consideration should be given to updating to the Summer 1978 Addenda.

# 2. R2, Pg 3C-2, Reference 2

Relief is requested from examining Class 1 and Class 2 component connections, piping, and associated valves and vessels that are 3/8-inch nominal wall thickness or less. The basis for relief is that volumetric examination of thin-walled pipe does not produce reliable results. Please justify your polition that no method of volumetric examination is reliable for thin-walled pipe. What consideration has been given to performing radiographic examinations of the welds subject to this request?

## 3. R3, Pg 3C-3. Reference 2

Reference 4 committed to deleting this request for relief from your ISI Program. What action has been taken to revise your program on this item?

## 4. R4, Pg 3C-3, Reference 2

Please clarify your request for relief from code requirements for "Class 2 components of systems or portions of systems that are required to operate above a pressure of 275 psig or temperature of 200<sup>0</sup>F <u>except</u> for limited periods....".

## 5. R5, Pg 3C-3, Reference 2

This request for relief concerns Class 2 systems or portions of systems that during normal plant operating conditions are not required to operate or perform a system function but remain flooded under static conditions at or near their normal operating pressures. This request pertains specifically to nondestructive examination of the isolation condenser. In Reference 4, you committed to nondestructive examination of isolation condenser piping greater than 4-inch NPS. What action has been taken to include these examinations in your program?

## 6. R7, Pg 3C-4, Reference 2

Relief is requested from volumetric examination of branch pipe-to-pipe welded joints that are Class 1 and greater than 6-inches-diameter, or Class 2. The basis for relief is that the physical design of branch connections does not permit meaningful volumetric examination, that this fact has been recognized by the 1977 Code, and the requirement for volumetric examination of

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branch connections has been dropped from the Code. The 1977 Code (Summer 1978 Addenda) requires the volumetric and surface examination of Class 1 branch pipe connection welds greater than 2-inch nominal pipe size. The most recent version seems to have more stringent requirements, please clarify your position. Also, please explain why radiography was rejected as a method for volumetric examination of branch connections. For Class 2 pipe branch connections, have you considered updating to the Summer 1978 Addenda for examination requirements?

7. GENERAL -- Responses to Previous NRC Requests for Additional Information<sup>(5)</sup>

Your response<sup>(4)</sup> to NRC Request<sup>(5)</sup> No. 7 is as follows: "Oyster Creek commits to define the extent and method of examination for all Class 1 and Class 2 categories as identified in Appendices 3A and  $3B^{(2)}$  by April 1981. These changes are part of the current revisions in-process. The revised program will be submitted to NRC."

What action has been taken to issue a revised ISI Program for Oyster Creek? Please confirm that all commitments made in your responses to the previous RAI will be incorporated in the revised ISI Program. Also, please submit your revised ISI Program document as soon as possible, preferably within 60 days.

8. Under the change in regulation 10CFR50.55a effective November 1, 1979, your ISI program, when finally approved, will cover your current 10-year inspection interval (December 8, 1979 to December 7, 1989). Does this result in any changes you wish to make in your relief requests? Do you require other ISI relief?

#### **REFERENCES:**

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- ASME Boiler and Pressure Vessel Code, Section XI, Division 1, 1974 Edition with Addenda to Summer 1975.
- Oyster Creek Nuclear Generating Station Inservice Inspection Program Update..., Rev. 2, June 25, 1979.
- ASME Boiler and Pressure Vessel Code, Section XI, Division 1, 1977 Edition with Addenda to Summer 1978.
- Letter, I. R. Finfrock, Jr. (JCP&L) to D. M. Crutchfield (NRC), dated February 5, 1981.
- Letter, D. M. Crutchfield (NRC) to I. R. Finfrock, Jr. (JCP&L), "Request for Additional Information, Oyster Creek Nuclear Generation Station ISI Program Update", October 30, 1980.

April 13, 1982