BALTIMORE GAS AND ELECTRIC COMPANY

GAS AND ELECTRIC BUILDING

BALTIMORE, MARYLAND 21203

ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

December 5, 1978

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Mr. Robert W. Reid, Chief
Operating Reactors Branch #4
Division of Operating Reactors

Subject: Calvert Cliffs Nuclear Power Plant
Units Nos. 1 & 2, Docket Nos. 50-317 & 50-318
Inservice Inspection (ISI) Program

Gentlemen:

The ASME Boiler and Pressure Vessel Code, Section XI currently requires that Class 1 and 2 piping be examined to fulfill the requirement for an Inservice Inspection of Nuclear Components. All piping, Class 1 and 2, is to be examined using the examination methods listed in Table IWB-2600 (Class 1) and IWC-2600 (Class 2). Where volumetric examination is required, ultrasonic inspection is utilized due to restrictions imposed by using radiography. Piping examination by ultrasonic testing is to be done per the provisions of Article 5 of Section V of the ASME code, since Appendix I of Section XI applies only to Class 1 and 2 ferritic vessels, 2 1/2 inches and over in wall thickness.

Article 5 of Section V requires that all indications with a response greater than 20 percent of the reference level shall be investigated to the extent that the operator can evaluate the shape, identity, and location of all such reflectors.

The above requirement becomes burdensome due to the number of irrelevant indications which could occur in this region due to noise. Additional difficulties arise because extra examination teams with examiners who are qualified Level II (or better) must be utilized. The use of these highly qualified examiners to record and evaluate indications which are not associated with true defects results in two undesireable conditions:

1) The examiners are not available time-wise to conduct meaningful inspections;

2) The examiners are unnecessarily exposed to radiation which increases their total man-rem burden and reduces their ultimate availability for future examinations in high radiation areas.

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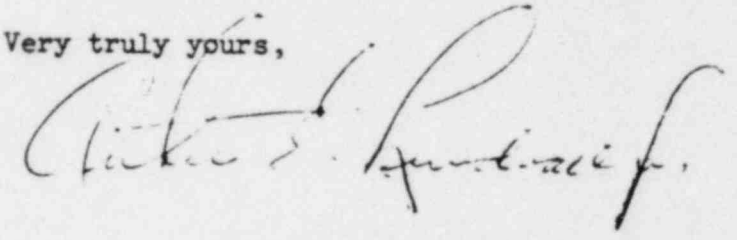
In light of the above, we propose the following alternative criteria to Article 5 of Section V of the Code:

All evaluations which exceed 100 percent of reference level will be evaluated, and all indications which exceed 50 percent of reference level will be recorded for future reference, as necessary. For vessels with >2 1/2 inches of wall thickness, the evaluation requirements of Appendix I, Section XI of the ASME Code will continue to apply.

We have discussed these new criteria with Mr. Glenn Walton of the Office of Inspection and Enforcement, Region I, and he has informed us that his office will consider the criteria to be in effect as of the mailing date of this letter. For record purposes, it is our intention to formally implement the revised criteria as of January 1, 1979, and we, therefore, ask your concurrence prior to that date.

Very truly yours,



cc - J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Mr. E. L. Conner, Jr. (NRC)
Mr. Glenn Walton, NRC (King of Prussia)