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NRC PDR L PDR DMB 016

Docket No. 50-346

Mr. Richard P. Crouse Vice President, Nuclear Toledo Edison Company Edison Plaza 300 Madison Avenue Toledo, Ohio 43652 ORB#4 Rdg
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Dear Mr. Crouse:

SUBJECT: AUXILIARY FEEDWATER HEADER REPAIR - REQUEST FOR ADDITIONAL

INFORMATION

We have reviewed your letter of July 15, 1982 (No. 839) which formalized the information presented to our staff at the meeting of June 24, 1982. Your letter also provided a cross reference to the questions raised by the staff in our letter of June 23, 1982.

We have reviewed the material submitted with your letter and, although we recognize that it does not constitute your formal response to our June 23, 1982 letter, we have the following questions and comments on the material submitted. These questions and comments are being presented to you at this time to guide you with the preparation of your formal response to support restart of the unit.

- 1. The responses to Items 6 and 9 in Attachment C of your July 15, 1982 letter are not complete. With respect to the stabilized internal header, we require the following information as a minimum:
 - a. Provide a summary of the analyses performed to assure that the structural integrity of the stabilized internal header will be maintained for the remaining life of the plant. Include a description of all forcing functions associated with ASME Level A, B, C and D loads, a brief description of the analyses performed and a summary of the results of the analyses.
 - b. Provide a more detailed description of the analyses performed to assure that the new location of the stabilized internal header, including the 1/8" minimum clearance between the upplugged steam generator tubes and the header/restraint, has been accounted for with respect to the design requirements in Section 4.1 of Attachment A of your July 15, 1982 letter, i.e. maximum differential thermal motion, maximum movement due to flow induced vibration and maximum thermal induced movement during heatup and cooldown.

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- c. Since the inlet opening to the internal header will not be closed, provide assurance that steam pockets cannot still be trapped in the header and cause additional damage in the event of their collapse.
- 2. It is our understanding that some of the internal header welds in the Oconee 3 plant were found to be cracked. These cracks were discovered as a result of special examinations to reveal the cause of holes formed in one of the Oconee 3 headers. These cracks were not detected by the initial examinations to establish the soundness of the header. Subsequent re-examination of the already stabilized header in the second steam generator at Oconee 3 revealed similar cracking. Discuss the structural integrity of the as-stabilized headers at Davis-Besse with respect to the potential for similar c cracks in header welds.
- Provide a commitment to prepare the ASME Section III required Design Reports for the modified steam generator and auxiliary feedwater piping systems.
- Provide a commitment to conduct the following tests prior to resumption of power operation:
 - a. A cold AFW flow test to verify that the minimum flow requirements specified for the design basis accidents (FSAR Chapter 15) will be met.
 - b. A water harmer test in accordance with the r quirements of NUREG-0899, Standard Review Plan, Section 10.4.7 and Branch Technical Position PSB 10-2. Describe your proposed test program.

The reporting 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 JOHN F. STOLZ

John F. Stolz, Chief Operating Reactors Branch #4 Division of Licensing

cc: See next page

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Toledo Edison Company

cc w/enclosure(s):

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