

NUCLEAR ENERGY SERVICES, INC.

> November 5, 1982 Ref. No. 45-719

Mr. Richard C. DeYoung, Director Office of Inspection & Enforcement U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Reference: IE Bulletin No. 82-03, Revision 1 Stress Corrosion Cracking in Thick Wall, Large Diameter, Stainless Steeel, Recirculation System Piping at BWR Plants

Dear Mr. DeYoung:

Our review of the referenced IE Bulletin indicates an error in the description of circumstances regarding the ultrasonic detection of indications in the safe-end to pipe welds. Specifically, the bulletin states in the first paragraph on page 3:

"About nine months before the leak, these safe-ends were ultrasonically (UT) inspected; at that time the inspection did not disclose any reportable indications. Subsequent to the leak, the UT procedure was modified; UT examination of the two affected safe-ends and one other safe-end confirmed the presence of indications of intermittent cracking around the pipe's inside diameter (ID)."

The potentially significant factual error is that the UT procedure for examining the safe-end welds was <u>not</u> modified prior to the examinations performed in 1982. Although NES can not assess the significance of this error, it could possibly divert consideration of rapid crack growth by establishing the assumption that the procedure used in prior examinations was inadequate.

It is possible that the misunderstanding regarding procedure revision occurred as a result of the different procedure used for examinations of recirculation piping welds. The piping procedure as used for prior outages had not included specific provisions for IGSCC because the

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system was not identified as service sensitive (NUREG 0313). Initial investigation of recirculation system piping welds in 1982 was performed with a revised procedure amended to incorporate NES' standard IGSCC techniques. Crack indications were detected with this procedure as well as with a subsequently modified technique.

It is also noted that IE Notice No. 82-39, SERVICE DEGRADATION OF THICK WALL STAINLESS STEEL RECIRCULATION SYSTEM PIPING AT A BWR PLANT, contains a similar error in the description of circumstances which may contribute to misinterpretation.

If our technical staff can be of assistance in further defining the status of the ultrasonic examinations, we are available to assist you.

Very truly yours,

NUCLEAR ENERGY SERVICES, INC. NES DIVISION

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