Detroit Edison

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EF2-59400

Mr. James G. Keppler,
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Keppler:

Subject: Final Report of 10CFR50.55(e) Item on Stainless Steel Piping (SA 312TP316 and TP316HF) (#62)

This is Detroit Edison's final report on the potential stainless steel piping problem No. 62. This item was originally reported to Mr. P. Pelke of NRC Region III by Project Quality Assurance's Mr. E. L. Thompson, Acting Supervisor-Construction Quality Assurance, on March 17, 1982.

It was previously reported that Stainless Steel Piping SA 312TP316 and SA 312TP316H had been found installed in lieu of the required SA 312TP316L. This is partially incorrect in that, to the best of our knowledge, TP316H pipe material has not been used on site. The actual discrepancy is that SA 312TP316 and SA 312TP316HF (Hot Finish) had been found installed in lieu of the required SA 312TP316L.

Deviation Disposition Requests (DDRs) have been written on piping where this problem was identified. Based on Engineering's evaluation, each of these DDRs has been dispositioned to use as is.

The problem with utilizing type 316 in place of type 316L is that the carbon content maximum for type 316 is 0.08% versus 0.035% maximum for type 316L. In evaluating this condition, Edison Engineering took a conservative approach and evaluated the potential and consequences of using type 316H (carbon maximum 0.04 to 0.10%) in place of type 316L. Edison Engineering determined that the only potential problem would be in cases where type 316H was used in instrument sample lines. Those lines are highly susceptible to developing Intergranular Stress Corrosion or Cracking (IGSCC) and the type 316H should be replaced.

Further evaluation by Edison Engineering revealed that no instrument sample lines were affected. Therefore, this is no longer considered to be a condition that would create a substantial safety hazard and no further corrective action is required.

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If you have any questions concerning this matter, please contact Mr. G. M. Trahey, Assistant Director-Project Quality Assurance.

Very truly yours,

DAW/WRW/mb

cc: Richard DeYoung, Director
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