LONG ISLAND LIGHTING COMPANY
SHOREHAM NUCLEAR POWER STATION
P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

July 10, 1984

SNRC-1059

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Inspection of BWR Stainless Steel Piping
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Reference: (1) Generic Letter 84-11 dated April 19, 1984
(2) Letter from LILCO to NRC, SNRC-1054, dated June 13, 1984.

Dear Mr. Denton:

This letter represents LILCO's response to Generic Letter 84-11, "Inspections of BWR Stainless Steel Piping".

The schedule of planned inspections has not been finalized for Shoreham since the formal In-Service Inspection (ISI) Plan is not complete and is only required to be submitted after issuance of the operating license. However, the most susceptible of welds, based on field experience, will be included in the ISI program. It should be noted that Shoreham has no unrepaired cracked welds and no weld overlays. However, the inspection scope will be expanded should cracks be found upon re-inspection. Crack evaluation and repair criteria have not been established, but are expected to comply with Attachment 2 to the Generic Letter.

During each Shoreham refueling outage, LILCO will inspect 100% of the intergranular stress corrosion cracking (IGSCC) - sensitive welds (all welds were originally UT inspected) that did not receive solution heat-treatment or induction-heating stress improvement (IHSI). Shoreham, which has not operated, has utilized the IHSI process for 74 welds and UT examined 25% of them. No cracks were found. At the time IHSI was considered and discussed with the staff, it was believed some credit in the form of a reduction in the inspection requirements would be given. The requirement to examine 100% of the welds not examined after IHSI therefore appears excessive.

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IHSI has been or may be performed at a number of BWR's after a period of operating time during which incipient cracking may have initiated. In this instance, IHSI may or may not cause further crack propagation. It is believed paragraph 2(d) may have been written for plants which were operated for some time period prior to IHSI. Our position is that the 25% sample, which has shown zero defects, should be sufficient for a non-operating plant such as Shoreham.

The identities of the welds that were UT examined following the IHSI process was made available to your Mr. Robert McBrearty, Reactor Inspector - Region I during his visit to the site in early June.

All level 2 and level 3 UT examiners will demonstrate their competence in accordance with IEB 83-02, and the level 1 examiners will demonstrate field performance capability. Their availability is unknown at present.

With regard to leak detection and leakage limits, the reactor coolant leakage detection systems will be operated in accordance with Shoreham's approved Technical Specifications, Section 3/4.4.3.

In the event cracks are found, remedial measures will be taken based upon crack size, length and location.

We hope that this letter addresses the concerns of Generic Letter 84-11 satisfactorily. If you have any questions or require additional information, please do not hesitate to contact this office.

Very truly yours,

John D. Leonard, Jr.
Vice President -
Nuclear Operations

AWZ/NRL:ck

cc: C. Petrone

AFFIDAVIT

STATE OF NEW YORK)
: ss: Shoreham Nuclear Power Station
COUNTY OF SUFFOLK)

I, JOHN D. LEONARD, Jr., being duly sworn, depose and say that I am the Vice-President of Nuclear Operations of the Long Island Lighting Company, the owner of the Shoreham Nuclear Power Station - Unit 1. I am authorized on the part of said Company to sign and file with the U.S. Nuclear Regulatory Commission (NRC) the foregoing response to the letter from the NRC. The response was prepared under my supervision and direction, and the statements contained therein are true and correct to the best of my knowledge and belief.

John D. Leonard, Jr.

Sworn to before me this
11 day of July, 1984

Connie-Maria Pardo

CONNIE-MARIA PARDO
NOTARY PUBLIC, State of New York
No. 52-4615810
Qualified in Suffolk County
Commission Expires March 30, 1985