

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

(215) 841-5001

October 5, 1984

Docket No. 50-278

Mr. Darrell G. Eisenhut  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

SUBJECT: Generic Letter 84-11, "Inspections of BWR  
Stainless Steel Piping"

Reference: S. L. Daltroff, Philadelphia Electric  
Company, to D. G. Eisenhut, USNRC, Response  
to Generic Letter 84-11, June 4, 1984

Dear Mr. Eisenhut:

The reference letter specified weld reinspections to be performed during the Spring 1985 Peach Bottom Unit 3 outage in accordance with the inspections required in items 2a through 2e of the subject Generic Letter. A total of thirty welds at specific locations was proposed to satisfy the NRC requirements for reinspection. A review of the proposed reinspection plan by Mr. S. D. Reynolds of the NRC Region I Staff, conducted during Combined Inspection 50-277/84-21 and 50-278/84-17 indicates that our response meets the requirements of the Generic Letter.

Philadelphia Electric Company has continued to evaluate the weld reinspection program previously proposed in lieu of performing pipe replacement during the Spring 1985 outage on Unit 3. The ongoing evaluation has indicated that it is desirable to modify certain weld reinspection locations specified in our response to Generic Letter 84-11. Only certain specific weld locations to be reinspected are being modified. The quantities which will be reinspected are not being reduced as a result of our re-evaluation.

The proposed changes are limited to reinspection of non-conforming welds in the 12-inch risers inspected previously with no indications and inspection of all weld overlays where

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circumferential cracks longer than 10% of circumference were measured. The changes are as stated below.

Item 2a - Reinspection of 20% of non-conforming welds in the 12-inch risers inspected previously with no indications.

<u>Locations to be Inspected</u>		<u>Locations Previously Specified to be Inspected</u>	
2-AHK-4	2-BHE-3	2-AHK-1	2-BHE-1
2-AHH-3	2-BHC-4	2-AHH-1	2-BHC-1
2-AHF-3	2-BHA-3	2-AHF-3	2-BHA-3

Reasons for changes:

The 2-XXX-1 series welds are extremely difficult to examine by UT because of cladding which was applied during original piping fabrication as a result of counterboring pipe. The cladding was applied to build up the wall thickness.

The 2-XXX-1 series welds have low Stress Rule Index (SRI) values, i.e., approximately 1.0, and cracking at these locations has not been a problem at Peach Bottom or other plants.

The 2-XXX-1 series welds were IHSI treated, NDE examined by RT using the MINAC, and found acceptable during the 1983 refueling outage.

The 2-XXX-4, -3 series welds have higher SRI values, and cracking at these locations was detected at other plants.

Item 2c - Inspection of all weld overlays where circumferential cracks longer than 10% of circumference were measured.

Philadelphia Electric Company will inspect the RHR system welds as specified in the reference response. However, that response contained a typographical error. The weld 10-1-15 should have been reported as weld 10-0-15. This weld will be reinspected even though the length of the

circumferential crack at this location was less than 2% of the circumference.

As an addition to this category of weld reinspection, the 'B' loop jet pump instrumentation penetration reducer to safe end weld will be inspected during the next Unit 3 outage. Circumferentially oriented cracks in this location were previously reported to the Commission via Licensee Event Report 3-84-08, July 9, 1984.

We believe these changes enhance our conformance to the requirements of Generic Letter 84-11.

Should you have any questions or require additional information, please do not hesitate to call.

Very truly yours,

A handwritten signature in cursive script, appearing to read "A. R. Blough".

cc: A. R. Blough, Site Inspector


COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF PHILADELPHIA :

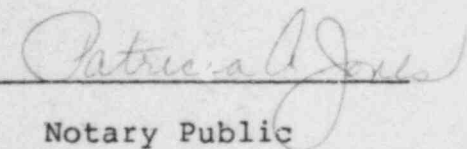
S. L. Daltroff, being first duly sworn, deposes and says:

That he is Vice President of Philadelphia Electric Company; that he has read the foregoing Supplemental Response to Generic Letter 84-11 and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



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Subscribed and sworn to  
before me this 5<sup>th</sup> day  
of Oct. 1984



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Notary Public

PATRICIA A. JONES  
Notary Public, Phila., Phila. Co.  
My Commission Expires Oct. 13, 1986