

TECHNICAL EVALUATION OF INTEGRITY OF  
THE PEACH BOTTOM UNITS 2 AND 3 REACTOR COOLANT  
BOUNDARY PIPING SYSTEM

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Peter K. Nagata  
Materials Engineering Branch  
Materials Sciences Division  
EG&G Idaho, Inc.  
Idaho Falls, Idaho 83415

Responsible NRC Individual and Division:  
W. H. Koo/Division of Engineering

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## ABSTRACT

NUREG-0313, Rev. 1, Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping, is the NRC staff's revised acceptable methods to reduce intergranular stress corrosion cracking in boiling water reactors. The responses to NRC Generic Letter 81-04 of the Philadelphia Electric Company concerning whether its Peach Bottom Atomic Power Station Units 2 and 3 meet NUREG-0313, Rev. 1 are evaluated by EG&G Idaho, Inc. in this report. Particular attention was given the leak detection systems described in Regulatory Guide 1.45, Reactor Coolant Pressure Boundary Leak Detection Systems, referenced by Parts IV.B.1.a.(1) and (2) found on pages 7 and 8 of NUREG-0313, Rev. 1.

## FOREWORD

This report is supplied as part of the Selected Operating Reactor Issues Program being conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of Licensing, by EG&G Idaho, Inc., Materials Engineering Branch.

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SUMMARY

As may be observed in the following table, with the exception of Parts IV.B.1.b.(3), IV.B.1.b.(4), and IV.B.2.b.(6), Peach Bottom 2 and 3 do not meet any of the parts of NUREG-0313, Rev. 1 evaluated in this document.

The following table is a synopsis of the EG&G Idaho, Inc. evaluation of Philadelphia Electric Company's response to NRC Generic Letter 81-04.

<u>Part of NUREG-0313, Rev. 1 Evaluated</u>	<u>Evaluation<sup>a</sup></u>	<u>Additional Data Required<sup>b</sup></u>	<u>Discrepancy</u>
Section II.			
II.C.	Provides alternative to NUREG-0313, Rev. 1	Yes	Minor
Section III.			
Section IV.			
IV.B.1.	Provides alternative to NUREG-0313, Rev. 1	Yes	Minor
IV.B.1.a.(1)	Provides alternative to NUREG-0313, Rev. 1	Yes	Major
IV.B.1.a.(2)	Does not meet NUREG-0313, Rev. 1	No	Major
IV.B.1.b.	Provides alternative to NUREG-0313, Rev. 1	No	Minor
IV.B.1.b.(3)	Meets NUREG-0313, Rev. 1	No	No
IV.B.1.b.(4)	Meets NUREG-0313, Rev. 1	No	No
IV.B.2.	Provides alternative to NUREG-0313, Rev. 1	Yes	Minor
IV.B.2.a.	The comments for Parts IV.B.1.a.(1) and IV.B.1.a.(2) apply here.		
IV.B.2.b.	Provides alternative to NUREG-0313, Rev. 1	No	Minor
IV.B.2.b.(6)	Meets NUREG-0313, Rev. 1	No	No

<sup>a</sup>See Tables 1 and 3 for additional information.

<sup>b</sup>See Tables 1 and 4 for additional information.

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1. INTRODUCTION

Intergranular stress corrosion cracking (IGSCC) of austenitic stainless steel (SS) piping has been observed in boiling water reactors (BWRs) since December 1965.<sup>1</sup> The NRC established a Pipe Crack Study Group (PCSG) in January 1975 to study the problem.<sup>2</sup> The PCSG issued two documents, NUREG-75/067 Technical Report, Investigation and Evaluation of Cracking in Austenitic Stainless Steel Piping of Boiling Water Reactors<sup>3</sup> and an implementation document, NUREG-0313, Rev. 0.<sup>2</sup> After cracking in large-diameter piping was discovered for the first time in the Duane Arnold BWR in 1978, a new PCSG was formed. The new PCSG in turn issued two reports, NUREG-0531, Investigation and Evaluation of Stress-Corrosion Cracking in Piping of Light Water Reactor Plants<sup>4</sup> and NUREG-0313, Rev. 1, Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping.<sup>5</sup> NUREG-0313, Rev. 1 is the implementing document of NUREG-0531 and discusses the augmented inservice inspection (ISI) and leak detection requirements "for plants that cannot comply with the material selection, testing, and processing guidelines" of NUREG-0313, Rev. 1.<sup>5</sup>

NRC Generic Letter 81-04 requested each licensee "to review all ASME Code Class 1 and 2 pressure boundary piping, safe ends, and fitting material, including weld metal to determine if (they) meet the material selection, testing and processing guidelines in" NUREG-0313, Rev. 1.<sup>6</sup> The generic letter offered the option of providing a description, schedule, and justification for alternative actions that would reduce the susceptibility of pressure boundary piping and safe ends to intergranular stress corrosion cracking (IGSCC) or increase the probability of early detection of leakage from pipe cracks.

In response to NRC Generic Letter 81-04, Philadelphia Electric Company submitted a letter on October 1, 1981.<sup>7</sup> A request for information from the NRC staff elicited additional letters on December 3, 1982<sup>8</sup> and December 15, 1982.<sup>9</sup> EG&G Idaho personnel evaluated these responses, and this report provides:

1. A brief summary of the licensee's response to each part of NUREG-0313, Rev. 1.
2. A discussion of areas where the licensee does not meet the guidelines or requirements of NUREG-0313, Rev. 1.<sup>a</sup>
3. A brief discussion of the licensee's proposed alternatives to NUREG-0313, Rev. 1; however, no determination of acceptability is made on these alternatives.
4. An identification of all areas where the licensee has not provided sufficient information to judge the licensee's program.

There is an effort underway to revise NUREG-0313, Rev. 1 by NRC in light of research on IGSCC and recent instances of IGSCC at Nine Mile Point (March 1982) and Monticello (October 1982). Because of this contemplated revision of NUREG-0313, Rev. 1, the following issues will not be evaluated.

1. The licensee's proposed Technical Specifications to implement the requirements, with the exception of the leak detection requirements in NUREG-0313, Revision 1, Sections IV.B.1.a.(1) and IV.B.1.(a)(2).
2. The acceptability of licensee-proposed augmented inservice inspection (ISI) sampling criteria.

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a. Part III of NUREG-0313, Rev. 1 contains guidelines; Part IV contains requirements.

3. Credit for past operating experience and inspection results.
4. The acceptability of induction heating stress improvement (IHSI), heat sink welding (HSW), and weld overlay as alternates to augmented ISI.

## 2. EVALUATION

### 2.1 NUREG-0313, Rev. 1 Guidelines

The guidelines and requirements outlined in NUREG-0313, Rev. 1 form the basis of this evaluation. The NUREG-0313, Rev. 1 guidelines are found in Parts III and V and the requirements in Parts II and IV of that document. Part II discusses implementation of material selection, testing, and processing guidelines. Part III summarizes acceptable methods to minimize IGSCC susceptibility with respect to the material selection, testing, and processing guidelines. Part IV deals with leak detection and inservice inspection requirements of nonconforming (i.e., not meeting the guidelines of Part III of NUREG-0313, Rev. 1) piping. Part V discusses general recommendations.

### 2.2 Discussion of Tables

Table 1 has the complete text Parts II through V of NUREG-0313, Rev. 1 on the left side so that the reader may be able to refer to it as the topics are discussed. The right side summarizes the licensee's responses, lists the differences between the licensee's proposed implementation program and NUREG-0313, Rev. 1, and identifies the additional data required to evaluate the licensee's response.

Many sections in Parts II through IV of NUREG-0313, Rev. 1 are not discussed in the right hand column. In these cases, one of the comments below will be used.

- o Not applicable because the construction permit for this plant has been issued.
- o Not applicable because the operating license for this plant has been issued.
- o Not applicable because the plant has been constructed.

- o The licensee has not furnished data on this topic in his responses to NRC Generic Letter 81-04.
  
- o No comment made because alternative plans were not evaluated.

Table 2 lists the summaries of the licensee's responses to NRC questions on implementation of NUREG-0313, Rev. 1 guidelines. Therefore, in Table 2 the reader is able to read all the summaries in one table without having to search Table 1 for all the summaries. The same compilation applies to Tables 3 and 4. Table 3 lists the differences between the licensee's proposed implementation program and that recommended in NUREG-0313, Rev. 1. Table 4 lists the areas where additional information is required to properly evaluate the licensee's proposed implementation program. All the items in Tables 2, 3, and 4 are listed in their respective tables in the order they appear in Table 1.

### 2.3 Discrepancies

Any alternate proposal that did not meet a specific guideline or requirement of NUREG-0313, Rev. 1 was considered a discrepancy. Evaluation of alternate proposals was outside the scope of this task, as indicated in Section 1 of this report. Licensees have submitted definitions of "non-service sensitive" and augmented ISI proposals that differ from NUREG-0313, Rev. 1. These differences are considered minor because the NRC staff is considering major modifications to those requirements. An example of a minor discrepancy is the use of the stress rule index (SRI) to choose which welds would be subjected to augmented ISI.

If the alternate proposal to leak detection does not meet the requirements in NUREG-0313, Rev. 1, it was considered a major discrepancy because NRC is not considering major modifications to those requirements. An example of a major discrepancy is a licensee's not proposing Technical Specifications to implement leak detection requirements in NUREG-0313, Rev. 1.

Only major discrepancies are listed in the Conclusions section.

### 3. CONCLUSIONS

Peach Bottom 2 and 3 have the following major discrepancies:

#### IV.B.1.a.(1) Leak Detection and Monitoring Systems

Philadelphia Electric Company has not adequately demonstrated that the Peach Bottom 2 and 3 leak detection and monitoring systems are in compliance with those described in Section C of Regulatory Guide 1.45.

#### IV.B.1.a.(2) Leak Detection Requirements

Philadelphia Electric Company has not put the provision for shutdown after a 2-gpm increase in unidentified leakage in 24 h into the Peach Bottom 2 and 3 Technical Specifications.

Philadelphia Electric Company has not put the provision for monitoring the sump level at 4-h (or less) intervals into the Peach Bottom 2 and 3 Technical Specifications.

There are minor discrepancies as well as the major ones listed above. These minor discrepancies are not listed here. However, it should not be inferred that NRC personnel approve of the actions taken by the licensee that were evaluated as minor discrepancies from NUREG-0313, Rev. 1.

The licensee has not supplied sufficient information to evaluate his responses to topics II.C, IV.B.1, IV.B.1.a.(1), IV.B.1.a.(2), IV.B.2, and IV.B.2.a. Table 4 lists the required information for each topic.



TABLE I. REVIEW OF LICENSEE'S RESPONSE TO NRC GENERIC LETTER 81-04

Excerpts from NUREG-0313, Rev. 1

EG&G Idaho Evaluation - PEACH BOTTOM 2 AND 3

II. IMPLEMENTATION OF MATERIAL SELECTION, TESTING, AND PROCESSING GUIDELINES

- II.A. For plants under review, but for which a construction permit has not been issued, all ASME Code Class 1, 2, and 3 lines should conform to the guidelines stated in Part III.
- II.B. For plants that have been issued a construction permit but not an operating license, all ASME Code Class 1, 2, and 3 lines should conform to the guidelines stated in Part III unless it can be demonstrated to the staff that implementing the guidelines of Part III would result in undue hardship. For cases in which the guidelines of Part III are not complied with, additional measures should be taken for Class 1 and 2 lines in accordance with the guidelines stated in Part IV of this document.
- II.C. For plants that have been issued an operating license, NRC designated "Service Sensitive" lines (Part IV. B) should be modified to conform to the guidelines stated in Part III, to the extent practicable. When "Service Sensitive" and other Class 1 and 2 lines do not meet the guidelines of Part III, additional measures should be taken in accordance with the guidelines stated in Part IV of this document. Lines that experience cracking during service and require replacement should be replaced with piping that conforms to the guidelines stated in Part III.

- A. Not applicable because the construction permit for this plant has been issued.
- B. Not applicable because the operating license for this plant has been issued.

C. SUMMARY

Philadelphia Electric Company (PECo) plans to replace some nonconforming "service sensitive" pipe and also plans to apply induction heating stress improvement (IHSI) to other nonconforming "service sensitive" pipe.

PECo has not supplied sufficient technical data on the application of IHSI to "service sensitive" piping to allow an evaluation as to whether NUREG-0313, Rev. 1 has been met.

DIFFERENCES

NUREG-0313, Rev. 1 requires that all NRC-designated "service sensitive" lines be replaced with corrosion-resistant materials to the extent practical. Also, lines that experience cracking should be replaced with corrosion-resistant materials.

PECo plans to replace some nonconforming "service sensitive" pipe with pipe which meets NUREG-0313, Rev. 1. PECo also plans to apply IHSI to other nonconforming "service sensitive" pipe.

#### ADDITIONAL DATA REQUIRED

1. Identify to which nonconforming "service sensitive" pipe the INSI technique will be applied.
2. Identify which nonconforming "service sensitive" pipe will be replaced with pipe that meets NUREG-0313, Rev. 1.
3. Identify which nonconforming "service sensitive" pipe will have neither of the above--replacement or INSI--applied to them. Indicate what measures will be taken on these pipes to mitigate IGSCC.

### III. SUMMARY OF ACCEPTABLE METHODS TO MINIMIZE CRACK SUSCEPTIBILITY--MATERIAL SELECTION, TESTING, AND PROCESSING GUIDELINES

#### III.A. Selection of Materials

Only those materials described in Paragraphs 1 and 2 below are acceptable to the NRC for installation in BWR ASME Code Class 1, 2, and 3 piping systems. Other materials may be used when evaluated and accepted by the NRC.

##### III.A.1. Corrosion-Resistant Materials

All pipe and fitting material including safe ends, thermal sleeves, and weld metal should be of a type and grade that has been demonstrated to be highly resistant to oxygen-assisted stress corrosion in the as-installed condition. Materials that have been so demonstrated include ferritic steels, "Nuclear Grade" austenitic stainless steels,\* Types 304L and 316L austenitic stainless steels, Type CF-3 cast stainless steel, Types CF-8 and CF-8M cast austenitic stainless steel with at least 5% ferrite, Type 308L stainless steel weld metal, and other austenitic stainless steel weld metal with at least 5% ferrite content. Unstabilized wrought austenitic stainless steel without controlled low carbon has not been so

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\*These materials have controlled low carbon (0.02% max) and nitrogen (0.1% max) contents and meet all requirements, including mechanical property requirements, of ASME specification for regular grades of Type 304 or 316 stainless steel pipe.

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A. The licensee has not furnished data on this paragraph in his responses to MRC Generic Letter 81-04. See comment on Part II.C. above.

1. The comments on III.A. also apply here.



demonstrated except when the piping is in the solution-annealed condition. The use of such material (i.e., regular grades of Types 304 and 316 stainless steels) should be avoided. If such material is used, the as-installed piping including welds should be in the solution-annealed condition. Where regular grades of Types 304 and 316 are used and welding or heat treatment is required, special measures, such as those prescribed in Part III.C, Processing of Materials, should be taken to ensure that IGSCC will not occur. Such measures may include (a) solution annealing subsequent to the welding or heat treatment, and (b) weld cladding of materials to be welded using procedures that have been demonstrated to reduce residual stresses and sensitization of surface materials.

III.A.2. Corrosion-Resistant Safe Ends and Thermal Sleeves

All unstabilized wrought austenitic stainless steel materials used for safe ends and thermal sleeves without controlled low carbon contents (L-grades and Nuclear Grade) should be in the solution-annealed condition. If as a consequence of fabrication, welds joining these materials are not solution annealed, they should be made between cast (or weld overlaid) austenitic stainless steel surfaces (5% minimum ferrite) or other materials having high resistance to oxygen-assisted stress corrosion. The joint design must be such that any high-stress areas in unstabilized wrought austenitic stainless steel without controlled low carbon content, which may become sensitized as a result of the welding process, is not exposed to the reactor coolant. Thermal sleeve attachments that are welded to the pressure boundary and form crevices where impurities may accumulate should not be exposed to a BWR coolant environment.

III.B. Testing of Materials

For new installation, tests should be made on all regular grade stainless steels to be used in the ASME Code Class 1, 2, and 3 piping systems to demonstrate that the material was properly

2. The comments on III.A. also apply here.

B. The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04.

annealed and is not susceptible to IGSCC. Tests that have been used to determine the susceptibility of IGSCC include Practices A\* and E\*\* of ASTM A-262.

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\*Practice A--Oxalic acid etch test for classification of etch structures of stainless steels.

\*\*Practice E--Copper-copper sulfate-sulfuric acid test for detecting susceptibility to intergranular attack in stainless steels.

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\*Recommended Practices for Detecting Susceptibility to Intergranular Attack in Stainless Steels\* and the electrochemical potentiokinetic reactivation (EPR) test. The EPR test is not yet accepted by the NRC. If the EPR test is used, the acceptance criteria applied must be evaluated and accepted by the NRC on a case-by-case basis.

### III.C. Processing of Materials

Corrosion-resistant cladding with a duplex microstructure (5% minimum ferrite) may be applied to the ends of Type 304 or 316 stainless steel pipe for the purpose of avoiding IGSCC at weldments. Such cladding, which is intended to

- (a) minimize the HAZ on the pipe inner surface,
- (b) move the HAZ away from the highly stressed region next to the attachment weld, and
- (c) isolate the weldment from the environment, may be applied under the following conditions:

III.C.1. For initial construction, provided that all of the piping is solution annealed after cladding.

III.C.2. For repair welding and modification to in-place systems in operating plants and plants under construction. When the repair welding or modification requires replacement of pipe, the replacement pipe should be solution-annealed after cladding. Corrosion-resistant cladding applied in the "field" (i.e., without subsequent solution annealing of the pipe) is acceptable only on that portion of the pipe that has not been removed from the piping system. Other "field"

C. The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04. See comments on Part II.C. above.

1. The comments on III.C. also apply here.

2. The comments on III.C. also apply here.

applications of corrosion-resistant cladding are not acceptable. Other processes that have been found by laboratory tests to minimize stresses and IGSCC in austenitic stainless steel weldments include induction heating stress improvement (IHSI) and heat sink welding (HSW). Although the use of these processes as an alternate to augmented inservice inspection is not yet accepted by the NRC, these processes may be permissible and will be considered on a case-by-case basis provided acceptable supportive data are submitted to the NRC.

IV. INSERVICE INSPECTION AND LEAK DETECTION REQUIREMENTS FOR BWRs WITH VARYING DEGREES OF CONFORMANCE TO MATERIAL SELECTION, TESTING, AND PROCESSING GUIDELINES

IV.A. For plants whose ASME Code Class 1, 2, and 3 pressure boundary piping meets the guidelines of Part III, no augmented inservice inspection or leak detection requirements beyond those specified in the 10 CFR 50.55a(g), "Inservice Inspection Requirements" and plant Technical Specifications for leakage detection are necessary.

IV.B. ASME Code Class 1 and 2 pressure boundary piping that does not meet guidelines of Part III is designated "Nonconforming" and must have additional inservice inspection and more stringent leak detection requirements. The degree of augmented inservice inspection of such piping depends on whether the specific "Nonconforming" piping runs are classified as "Service Sensitive." The "Service Sensitive" lines were and will be designated by the NRC and are defined as those that have experienced cracking of a generic nature, or that are considered to be particularly susceptible to cracking because of a combination of high local stress, material condition, and high oxygen content in the relatively stagnant, intermittent, or low-flow coolant. Currently, for the nonconforming ASME Code Class 3 piping, no additional inservice inspection beyond the Section XI visual examination is required.

A. The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04.

B. The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04.

Examples of piping considered to be "Service Sensitive" include but are not limited to: core spray lines, recirculation riser lines,\* recirculation bypass lines (or pipe

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\*Since no IGSCC has been observed in the domestic plants and in view of the possible high radiation exposure to the inspection personnel, surveillance and monitoring means other than those specified in Section IV of this report for recirculation riser lines will be considered on a case-by-case basis.

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extensions/stub tubes on plants where the bypass lines have been removed), control rod drive (CRD) hydraulic return lines, isolation condenser lines, recirculation inlet lines at safe ends where crevices are formed by the welded thermal sleeve attachments, and shutdown heat exchanger lines. If cracking should later be found in a particular piping run and considered to be generic, it will be designated by the NRC as "Service Sensitive." Leakage detection and augmented inservice inspection requirements for "Nonconforming" lines and "Nonconforming, Service Sensitive" lines are specified below:

IV.B.1. "Nonconforming" Lines That Are Not "Service Sensitive"

1. SUMMARY

PECo does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program, because, in part, of their planned long term modifications to reduce augmented ISI requirements.

PECo has not supplied sufficient data on its long term modifications to show that the modifications meet NUREG-0313, Rev. 1.

DIFFERENCES

NRC Generic Letter 81-04 requires that the licensee's Technical Specifications be changed to include an augmented ISI program for nonconforming piping.

PECo has indicated that its long term program included replacing selected piping with material that meets NUREG-0313, Rev. 1; and evaluating the induction heating stress improvement (IHSI) process for inhibiting propagation of IGSCC. Therefore, PECO does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program for nonconforming piping because of this long term program to reduce augmented ISI requirements.

ADDITIONAL DATA REQUIRED

1. What proportion of the nonconforming piping now in Peach Bottom 2 and 3 will be subjected to replacement on a planned basis and to IHSI?
2. What are the selection criteria for a pipe to be subjected to replacement or IHSI?

IV.B.1.a. Leak Detection: The reactor coolant leakage detection systems should be operated under the Technical Specification requirements to enhance the discovery of unidentified leakage that may include through-wall cracks developed in austenitic stainless steel piping.

IV.B.1.a.(1) The leakage detection system provided should include sufficiently diverse leak detection methods with adequate sensitivity to detect and measure small leaks in a timely manner and to identify the leakage sources within the practical limits. Acceptable leakage detection and monitoring systems are described in Section C, Regulatory Position of Regulatory Guide 1.45, "Reactor Coolant Pressure Boundary Leakage Detection Systems."

Particular attention should be given to upgrading and calibrating those leak detection systems that will provide prompt indication of an increase in leakage rate.

Other equivalent leakage detection and collection systems will be reviewed on a case-by-case basis.

a. The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04.

(i) SUMMARY

PECo's description of Peach Bottom 2 and 3's leak detection methods is not detailed enough to determine whether they meet Section C of Regulatory Guide 1.45.

DIFFERENCES

The nine subsections of Section C of Regulatory Guide 1.45 are discussed below.

C.1 PECo has stated that leakage to the primary reactor containment from identified sources is collected such that

- a. the flow rates are monitored separately from unidentified leakage,<sup>8</sup> and
- b. the total flow rate can be established and monitored.<sup>8</sup>

C.2 Due to many complex factors, it is not clear that unidentified leakage to the primary reactor containment in Peach Bottom 2 and 3 can be collected and the flow rate monitored with an accuracy of 1 gpm or better.<sup>8</sup> However, a "leakage (detection) capability on the order of 1 gpm is expected."<sup>10</sup> (FSAR Section 4.10.3)

C.3 The PECO leak detection systems consist of the following:

- a. Drywell Temperature Monitor
- b. Drywell Pressure Monitor
- c. Airborne Radioactivity Monitors
  - Radioactive Noble Gas Monitor
  - Iodine Monitor
  - Particulate Monitor
- d. Drywell Floor Drain Sump Monitor.<sup>8</sup>

The above systems meet Section C.3 of Regulatory Guide 1.45.

C.4 It is not clear whether provisions have been made at Peach Bottom 2 and 3 FSAR to monitor systems connected to the RCPB for signs of intersystem leakage.

C.5 It is not clear from the Peach Bottom 2 and 3 FSARs if the sensitivity and response time for the unidentified leakage is adequate to detect a leakage rate of 1 gpm in less than 1 h.

C.6 The Peach Bottom 2 and 3 airborne particulate radioactivity monitoring system is not functional when subjected to SSE.

C.7 Indicators and alarms for the required leakage detection system are provided in the main control room. It is not clear from the Peach Bottom 2 and 3 FSAR whether procedures for converting various indications to a common leakage equivalent are available to the operators.

It is not known whether calibration of the indicators accounts for the needed independent variables.

C.8 All Peach Bottom 2 and 3's leak detection systems enumerated in Reference 8 can be calibrated or tested during operation.

C.9 The Peach Bottom 2 and 3 Technical Specifications include limiting conditions for identified and unidentified leakage.

PECo has identified the availability of the Peach Bottom 2 and 3 systems for detecting and monitoring leakage. Either the sump or the air sampling system is always available.<sup>11</sup>

It cannot be determined from the above whether Peach Bottom 2 and 3 meet Regulatory Guide 1.45, Section C.

#### ADDITIONAL DATA REQUIRED

1. Indicate whether provisions have been made in the Peach Bottom 2 and 3 FSAR to monitor systems connected to the RCPB for signs of intersystem leakage (Subsection C.4 of Regulatory Guide 1.45).
2. Indicate whether calibration of the indicators accounts for the needed independent variables. Also, indicate whether procedures for converting various indications to a common leakage equivalent are available to the operators (Subsection C.7 of Regulatory Guide 1.45).
3. Indicate whether the sensitivity and response time for unidentified leakage is adequate to detect a leakage rate of 1 gpm in less than 1 h. (Subsection C.5 of Regulatory Guide 1.45).

#### (2) SUMMARY

Philadelphia Electric Company (PECo) has not changed the Peach Bottom 2 and 3 Technical Specifications to incorporate the provision for shutdown for a 2-gpm increase in unidentified leakage in 24 h. PECO does not monitor the sump level at the intervals required by NUREG-0313, Rev. 1.

PECo does not meet NUREG-0313, Rev. 1 in this matter.

#### DIFFERENCES

NUREG-0313, Rev. 1 requires that reactor shutdown be initiated when there is a 2-gpm increase in unidentified leakage in 24 h. For sump level monitoring systems with the fixed-measurement interval method, the level should be monitored every 4 h or less. NRC Generic Letter 81-04 requires that the above requirements be incorporated in the plant Technical Specifications.

PECo indicates that it has been meeting this part of NUREG-0313, Rev. 1. Peach Bottom Technical Specification 3.6.C together with Peach Bottom surveillance tests already meet NUREG-0313, Rev. 1. PECO plans to incorporate the model Technical Specifications attached to NRC Generic Letter 81-04 to the extent that it is applicable to the Peach Bottom design.<sup>12</sup>

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IV.B.1.a.(2) Plant shutdown should be initiated for inspection and corrective action when any leakage detection system indicates, within a period of 24 hours or less, an increase in rate of unidentified leakage in excess of 2 gallons per minute or its equivalent, or when the total unidentified leakage attains a rate of 5 gallons per minute or its equivalent, whichever occurs first. For sump level monitoring systems with fixed-measurement interval method, the level should be monitored at 4-hour intervals or less.



ADDITIONAL DATA REQUIRED

Please submit the proposed changes in the Peach Bottom 2 and 3 Technical Specifications regarding leak rate limits and leakage monitoring intervals.

IV.B.1.a.(3) Unidentified leakage should include all leakage other than:

IV.B.1.a.(3)(a) Leakage into closed systems, such as pump seal or valve packing leaks that are captured, flow metered, and conducted to a sump or collecting tank, or

IV.B.1.a.(3)(b) Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operations of unidentified leakage monitoring systems or not to be from a through-wall crack in the piping within the reactor coolant pressure boundary.

IV.B.1.b. Augmented Inservice Inspection: Inservice inspection of the "Nonconforming, Nonservice Sensitive" lines should be conducted in accordance with the following program:\*

\*This program is largely taken from the requirements of ASME Boiler and Pressure Vessel Code, Section II, referenced in the paragraph (b) of 10 CFR 50.55a, "Codes and Standards."

(3) No comment made because alternative plans were not evaluated. PECO meets NUREG-0313, Rev. 1 in this matter (FSAR Section 4.10.3).

(a) The comments on IV.B.1.a.(3) also apply here.

(b) The comments on IV.B.1.a.(3) also apply here.

b. SUMMARY

PECO intends to implement an alternative augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3.

DIFFERENCES

NUREG-0313, Rev. 1 requires that nonconforming "nonservice sensitive" piping be subject to an augmented ISI program.

PECO intends to implement an augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3. [There are no ASME Code Class 2 nonconforming pipes in Peach Bottom 2 and 3.] PECO will use the Stress Rule Index, industry experience, flow conditions, and minimization of personnel radiation exposure to "establish boundary locations in certain systems which will provide necessary assurance of pressure boundary integrity and a reasonably achievable examination program.\*" Credit will be taken for past examinations.

ADDITIONAL DATA REQUIRED

None.

IV.B.1.a.(1) For ASME Code Class 1 components and piping, each pressure-retaining dissimilar metal weld subject to inservice inspection requirements of Section II should be examined at least once in no more than 30 months (two-thirds of the time

(1) The comments on IV.B.1.b. also apply here.



prescribed in the ASME Boiler and Pressure Vessel Code Section XI). Such examination should include all internal attachment welds that are not through-wall welds but are welded to or form part of the pressure boundary.

IV.B.1.a.(2) The following ASME Code Class 1 pipe welds subject to inservice inspection requirements of Section XI should be examined at least once in no more than 80 months:

IV.B.1.a.(2)(a) All welds at terminal ends\* of pipe at vessel nozzles;

\*Terminal ends are the extremities of piping runs that connect to structures, components (such as vessels, pumps, valves) or pipe anchors, each of which acts as rigid restraints or provides at least two degrees of restraint to piping thermal expansion.

IV.B.1.a.(2)(b) All welds having a design combined primary plus secondary stress range of  $2.4S_m$  or more;

IV.B.1.a.(2)(c) All welds having a design cumulative fatigue usage factor of 0.4 or more; and

IV.B.1.a.(2)(d) Sufficient additional welds with high potential for cracking to make the total equal to 25% of the welds in each piping system.

IV.B.1.a.(3) The following ASME Code Class 2 pipe welds, subject to inservice inspection requirements of Section XI, in each residual heat removal system, emergency core cooling system, and containment heat removal systems should be examined at least once in no more than 80 months:

(2) The comments on IV.B.1.b. also apply here.

(a) The comments on IV.B.1.b. also apply here.

(b) The comments on IV.B.1.b. also apply here.

(c) The comments on IV.B.1.b. also apply here.

(d) The comments on IV.B.1.b. also apply here.

### (3) SUMMARY

PECo has no ASME Code Class 2 piping in Peach Bottom 2 and 3. Therefore, PECO need not have an augmented ISI plan for these pipes.

### DIFFERENCES

NUREG-0313, Rev. 1 requires that nonconforming ASME Code Class 1 and Class 2 piping be subjected to an augmented ISI program. The augmented ISI program for ASME Code Class 1 piping differs from that required on Class 2 piping. Also, augmented ISI requirements differ for ASME Code Class 2 pipes to be inspected per Parts IV.B.1.a.(3) and IV.B.1.a.(4) of NUREG-0313, Rev. 1.

PECo has no ASME Code Class 2 pipes in Peach Bottom 2 and 3. Therefore, there is no need for an augmented ISI for ASME Code Class 2 piping in Peach Bottom 2 and 3.

None.

- IV.B.1.b.(3)(a) All welds of the terminal ends of pipe at vessel nozzles, and
- IV.B.1.b.(3)(b) At least 10% of the welds selected proportionately from the following categories:
- IV.B.1.b.(3)(b)(i) Circumferential welds at locations where the stresses under the loadings resulting from any plant conditions as calculated by the sum of Equations (9) and (10) in NC-3652 exceed  $0.8 (1.2S_h + S_A)$ ;
- IV.B.1.b.(3)(b)(ii) Welds at terminal ends of piping, including branch runs;
- IV.B.1.b.(3)(b)(iii) Dissimilar metal welds;
- IV.B.1.b.(3)(b)(iv) Welds at structural discontinuities; and
- IV.B.1.b.(3)(b)(v) Welds that cannot be pressure tested in accordance with IWC-5000.

The welds to be examined shall be distributed approximately equally among runs (or portions of runs) that are essentially similar in design, size, system function, and service conditions.

- IV.B.1.b.(4) The following ASME Code Class 2 pipe welds in systems other than residual heat removal systems, emergency core cooling systems, and containment heat removal systems, which are subject to inservice inspection requirements of Section XI, should be inspected at least once in no more than 80 months:

- (a) The comments on IV.B.1.b.(3) also apply here.
- (b) The comments on IV.B.1.b.(3) also apply here.
- (i) The comments on IV.B.1.b.(3) also apply here.
- (ii) The comments on IV.B.1.b.(3) also apply here.
- (iii) The comments on IV.B.1.b.(3) also apply here.
- (iv) The comments on IV.B.1.b.(3) also apply here.
- (v) The comments on IV.B.1.b.(3) also apply here.

#### (4) SUMMARY

PECO has no ASME Code Class 2 piping in Peach Bottom 2 and 3. Therefore, PECO need not have an augmented ISI plan for these pipes.

#### DIFFERENCES

NUREG-0313, Rev. 1 requires that nonconforming ASME Code Class 1 and Class 2 piping be subjected to an augmented ISI program. The augmented ISI program for ASME Code Class 1 piping differs from that required on Class 2 piping. Also, augmented ISI requirements differ for ASME Code Class 2 pipes to be inspected per Parts IV.B.1.b.(3) and IV.B.1.b.(4) of NUREG-0313, Rev. 1.

PECO has no ASME Code Class 2 pipes in Peach Bottom 2 and 3. Therefore, there is no need for an augmented ISI for ASME Code Class 2 piping in Peach Bottom 2 and 3.

ADDITIONAL DATA REQUIRED

None.

- IV.B.1.b.(4)(a) All welds at locations where the stresses under the loadings resulting from "Normal" and "Upset" plant conditions including the operating basis earthquake (OBE) as calculated by the sum of Equations (9) and (10) in NC-3652 exceed 0.8  $(1.2S_h + S_A)$ ;
- IV.B.1.b.(4)(b) All welds at terminal ends of piping, including branch runs;
- IV.B.1.b.(4)(c) All dissimilar metal welds;
- IV.B.1.b.(4)(d) Additional welds with high potential for cracking at structural discontinuities\* such that the total number of welds selected for examination equal to 25% of the circumferential welds in each piping system.

- (a) The comments on IV.B.1.b.(4) also apply here.
- (b) The comments on IV.B.1.b.(4) also apply here.
- (c) The comments on IV.B.1.b.(4) also apply here.
- (d) The comments on IV.B.1.b.(4) also apply here.

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\*Structural discontinuities include pipe weld joints to vessel nozzles, valve bodies, pump casings, pipe fittings (such as elbows, tees, reducers, flanges, etc., conforming to ANSI Standard B 16.9) and pipe branch connections and fittings.

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- IV.B.1.b.(5) If examination of (1), (2), (3), and (4) above conducted during the first 80 months reveal no incidence of stress corrosion cracking, the examination frequency thereafter can revert to 120 months as prescribed in Section XI of the ASME Boiler and Pressure Vessel Code.
- IV.B.1.b.(6) Sampling plans other than those described in (2), (3), and (4) above will be reviewed on a case-by-case basis.

- (5) The comments on IV.B.1.b.(1), (2), (3), and (4) also apply here.
- (6) The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04.

IV.B.2. "Nonconforming" Lines That are "Service Sensitive"

2. SUMMARY

PECo does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program, because, in part, of their planned long term modifications to reduce augmented ISI requirements.

PECo has presented an alternative plan to the augmented ISI plan in NUREG-0313, Rev. 1.

IV.B.2.a. Leak Detection: The leakage detection requirements, described in IV.B.1.a above, should be implemented.

IV.B.2.b. Augmented Inservice Inspection:

#### DIFFERENCES

NUREG-0313, Rev. 1 requires that the licensee's Technical Specifications be changed to include an augmented ISI program for nonconforming piping.

PECo has indicated that its long term program included replacing selected piping with material that meets NUREG-0313, Rev. 1; and evaluating the induction heating stress improvement (IHSI) process for inhibiting propagation of IGSCC. Therefore, PECO does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program for nonconforming piping because of this long term program to reduce augmented ISI requirements.

#### ADDITIONAL DATA REQUIRED

1. What proportion of the nonconforming piping now in Peach Bottom 2 and 3 will be subjected to replacement on a planned basis and to IHSI?
  2. What are the selection criteria for a pipe to be subjected to replacement or IHSI?
- a. The comments made in Parts IV.B.1.a.(1) and IV.B.1.a.(2) apply here.

#### b. SUMMARY

PECo intends to implement an alternative augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3.

#### DIFFERENCES

NUREG-0313, Rev. 1 requires that nonconforming "service sensitive" piping be subject to an augmented ISI program.

PECo intends to implement an augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3. (There are no ASME Code Class 2 nonconforming pipes in Peach Bottom 2 and 3.) PECO will use the Stress Rule Index, industry experience, flow conditions, and minimization of personnel radiation exposure to "establish boundary locations in certain systems which will provide necessary assurance of pressure boundary integrity and a reasonably achievable examination program." Credit will be taken for past examinations.

#### ADDITIONAL DATA REQUIRED

None.

IV.B.2.b.(1) The welds and adjoining areas of bypass piping of the discharge valves in the main recirculation loops, and of the austenitic stainless steel reactor core spray piping up to and including the second isolation valve, should be examined at each reactor refueling outage or at other scheduled plant outages. Successive examination need not be closer than 6 months, if outages occur more frequently than 6 months. This requirement applies to all welds in all bypass lines whether the 4-inch valve is kept open or closed during operation.

In the event these examinations find the piping free of unacceptable indications for three successive inspections, the examination may be extended to each 36-month period (plus or minus by as much as 12 months) coincident with a refueling outage. In these cases, the successive examination may be limited to all welds in one bypass pipe run and one reactor core spray piping run. If unacceptable flaw indications are detected, the remaining piping runs in each group should be examined.

In the event these 36-month period examinations reveal no unacceptable indications for three successive inspections, the welds and adjoining areas of these piping runs should be examined as described in IV.B.1.b(1) for dissimilar metal welds and in IV.B.1.b(2) for other welds.

IV.B.2.b.(2) The dissimilar metal welds and adjoining areas of other ASME Code Class 1 "Service Sensitive" piping should be examined at each reactor refueling outage or at other scheduled plant outages. Successive examinations need not be closer than 6 months, if outages occur more frequently than 6 months. Such examination should include all internal attachments that are not through-wall welds but are welded to or form part of the pressure boundary.

(1) The comments on IV.B.2.b. also apply here.

(2) The comments on IV.B.2.b. also apply here.



IV.B.2.b.(3) The welds and adjoining areas of other ASME Code Class 1 "Service Sensitive" piping should be examined using the sampling plan described in IV.B.1.b(2) except that the frequency of such examinations should be at each reactor refueling outage or at other scheduled plant outages. Successive examinations need not be closer than 6 months, if outages occur more frequently than 6 months.

IV.B.2.b.(4) The adjoining areas of internal attachment welds in recirculation inlet lines at safe ends where crevices are formed by the welded thermal sleeve attachments should be examined at each reactor refueling outage or at other scheduled plant outages. Successive examinations need not be closer than 6 months, if outages occur more frequently than 6 months.

IV.B.2.b.(5) In the event the examinations described in (2), (3) and (4) above find the piping free of unacceptable indications for three successive inspections, the examination may be extended to each 36-month period (plus or minus by as much as 12 months) coinciding with a refueling outage.

In the event these 36-month period examinations reveal no unacceptable indications for three successive inspections, the frequency of examination may revert to 80-month periods (two-thirds the time prescribed in the ASME Code Section XI).

IV.B.2.b.(6) The area, extent, and frequency of examination of the augmented inservice inspection for ASME Code Class 2 "Service Sensitive" lines will be determined on a case-by-case basis.

(3) The comments on IV.B.2.b. also apply here.

(4) The comments on IV.B.2.b. also apply here.

(5) The comments on IV.B.2.b. also apply here.

#### (6) SUMMARY

PECo has no ASME Code Class 2 piping in Peach Bottom 2 and 3. Therefore, PECO need not have an augmented ISI plan for these pipes.

#### DIFFERENCES

NUREG-0313, Rev. 1 requires that nonconforming ASME Code Class 1 and Class 2 piping be subjected to an augmented ISI program. The augmented ISI program for ASME Code Class 1 piping differs from that required on Class 2 piping.

PECo has no ASME Code Class 2 piping in Peach Bottom 2 and 3. Therefore, there is no need for an augmented ISI for ASME Code Class 2 piping in Peach Bottom 2 and 3.

ADDITIONAL DATA REQUIRED

None.

3. The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04.

IV.B.3. Nondestructive Examination (NDE) Requirements

The method of examination and volume of material to be examined, the allowable indication standards, and examination procedures should comply with the requirements set forth in the applicable Edition and Addenda of the ASME Code, Section XI, specified in Paragraph (g), "Inservice Inspection Requirements," of 10 CFR 50.55a, "Codes and Standards."

In some cases, the code examination procedures may not be effective for detecting or evaluating IGSCC and other ultrasonic (UT) procedures or advanced nondestructive examination techniques may be required to detect and evaluate stress corrosion cracking in austenitic stainless steel piping. Improved UT procedures have been developed by certain organizations. These improved UT detection and evaluation procedures that have been or can be demonstrated to the NRC to be effective in detecting IGSCC should be used in the inservice inspection.

Recommendations for the development and eventual implementation of these improved techniques are included in Part V.

V. GENERAL RECOMMENDATIONS

The measures outlined in Part III of this document provide for positive actions that are consistent with current technology. The implementation of these actions should markedly reduce the susceptibility of stainless steel piping to stress corrosion cracking in BWRs. It is recognized that additional means could be used to limit the extent of stress corrosion cracking of BWR pressure boundary piping materials and to improve the overall system integrity. These include plant design and operational procedure considerations to reduce system exposure to potentially aggressive environment, improved material selection, special fabrication and welding techniques, and provisions for volumetric inspection capability in the design of weld joints. The use of such means to limit IGSCC or to improve plant system integrity will be reviewed on a case-by-case basis.

- V. The licensee has not furnished data on this paragraph in his responses to NRC Generic Letter 81-04.

TABLE 2

SUMMARIES OF EVALUATION  
OF LICENSEE'S RESPONSES

II.C. Material Selection, Testing, and Processing Guidelines for BWRs with  
an Operating License

Philadelphia Electric Company (PECo) plans to replace some nonconforming "service sensitive" pipe and also plans to apply induction heating stress improvement (IHSI) to other nonconforming "service sensitive" pipe.

PECo has not supplied sufficient technical data on the application of IHSI to "service sensitive" piping to allow an evaluation as to whether NUREG-0313, Rev. 1 has been met.

IV.B.1. Incorporating an Augmented ISI Program for "Nonservice Sensitive"  
Piping into the Technical Specifications

PECo does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program, because, in part, of their planned long term modifications to reduce augmented ISI requirements.

PECo has not supplied sufficient data on its long term modifications to show that the modifications meet NUREG-0313, Rev. 1.

IV.B.1.a.(1) Leak Detection Methods

PECo's description of Peach Bottom 2 and 3's leak detection methods is not detailed enough to determine whether they meet Section C of Regulatory Guide 1.45.



#### IV.B.1.a.(2) Shutdown for Leakage

Philadelphia Electric Company (PECo) has not changed the Peach Bottom 2 and 3 Technical Specifications to incorporate the provision for shutdown for a 2-gpm increase in unidentified leakage in 24 h. PECo does not monitor the sump level at the intervals required by NUREG-0313, Rev. 1.

PECo does not meet NUREG-0313, Rev. 1 in this matter.

#### IV.B.1.b. Augmented ISI Program on Nonconforming "Nonservice Sensitive" Pipes

PECo intends to implement an alternative augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3.

#### IV.B.1.b.(3) Augmented ISI for ASME Code Class 2 Pipe Welds

PECo has no ASME Code Class 2 piping in Peach Bottom 2 and 3. Therefore, PECo need not have an augmented ISI plan for these pipes.

#### IV.B.1.b.(4) Augmented ISI for ASME Code Class 2 Pipe Welds

PECo has no ASME Code Class 2 piping in Peach Bottom 2 and 3. Therefore, PECo need not have an augmented ISI plan for these pipes.

#### IV.B.2. Incorporating an Augmented ISI Program for "Service Sensitive" Piping into the Technical Specifications

PECo does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program, because, in part, of their planned long term modifications to reduce augmented ISI requirements.

PECo has presented an alternative plan to the augmented ISI plan in NUREG-0313, Rev. 1.

IV.B.2.b. Augmented ISI Program on Nonconforming "Service Sensitive" Pipes

PECo intends to implement an alternative augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3.

IV.B.2.b.(6) Augmented ISI for ASME Code Class 2 Pipe Welds

PECo has no ASME Code Class 2 piping in Peach Bottom 2 and 3. Therefore, PECO need not have an augmented ISI plan for these pipes.

TABLE 3

DIFFERENCES BETWEEN NUREG-0313, REV. 1  
AND LICENSEE'S RESPONSES

II.C. Material Selection, Testing, and Processing Guidelines for BWRs with an Operating License

NUREG-0313, Rev. 1 requires that all NRC-designated "service sensitive" lines be replaced with corrosion-resistant materials to the extent practical. Also, lines that experience cracking should be replaced with corrosion-resistant materials.

PECo plans to replace some nonconforming "service sensitive" pipe with pipe which meets NUREG-0313, Rev. 1. PECO also plans to apply IHSI to other nonconforming "service sensitive" pipe.<sup>7</sup>

IV.B.1. Incorporating an Augmented ISI Program for "Nonservice Sensitive" Piping into the Technical Specifications

NRC Generic Letter 81-04 requires that the licensee's Technical Specifications be changed to include an augmented ISI program for nonconforming piping.

PECo has indicated that its long term program included replacing selected piping with material that meets NUREG-0313, Rev. 1; and evaluating the induction heating stress improvement (IHSI) process for inhibiting propagation of IGSCC.<sup>7</sup> Therefore, PECO does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program for nonconforming piping because of this long term program to reduce augmented ISI requirements.

#### IV.B.1.a.(1) Leak Detection Methods

The nine subsections of Section C of Regulatory Guide 1.45 are discussed below.

- C.1 PECO has stated that leakage to the primary reactor containment from identified sources is collected such that
- a. the flow rates are monitored separately from unidentified leakage,<sup>8</sup> and
  - b. the total flow rate can be established and monitored.<sup>8</sup>
- C.2 Due to many complex factors, it is not clear that unidentified leakage to the primary reactor containment in Peach Bottom 2 and 3 can be collected and the flow rate monitored with an accuracy of 1 gpm or better.<sup>8</sup> However, a "leakage (detection) capability on the order of 1 gpm is expected."<sup>10</sup> (FSAR Section 4.10.3)
- C.3 The PECO leak detection systems consist of the following:
- a. Drywell Temperature Monitor
  - b. Drywell Pressure Monitor
  - c. Airborne Radioactivity Monitors
    - Radioactive Noble Gas Monitor
    - Iodine Monitor
    - Particulate Monitor
  - d. Drywell Floor Drain Sump Monitor.<sup>8</sup>

The above systems meet Section C.3 of Regulatory Guide 1.45.

- C.4 It is not clear whether provisions have been made at Peach Bottom 2 and 3 to monitor systems connected to the RCPB for signs of intersystem leakage.
- C.5 It is not clear from the Peach Bottom 2 and 3 FSARs if the sensitivity and response time for the unidentified leakage is adequate to detect a leakage rate of 1 gpm in less than 1 h.
- C.6 The Peach Bottom 2 and 3 airborne particulate radioactivity monitoring system is not functional when subjected to SSE.
- C.7 Indicators and alarms for the required leakage detection system are provided in the main control room. It is not clear from the Peach Bottom 2 and 3 FSAR whether procedures for converting various indications to a common leakage equivalent are available to the operators.

It is not known whether calibration of the indicators accounts for the needed independent variables.

- C.8 All Peach Bottom 2 and 3's leak detection systems enumerated in Reference 8 can be calibrated or tested during operation.
- C.9 The Peach Bottom 2 and 3 Technical Specifications include limiting conditions for identified and unidentified leakage.

PECo has identified the availability of the Peach Bottom 2 and 3 systems for detecting and monitoring leakage. Either the sump or the air sampling system is always available.<sup>11</sup>

It cannot be determined from the above whether Peach Bottom 2 and 3 meet Regulatory Guide 1.45, Section C.

#### IV.B.1.a.(2) Shutdown for Leakage

NUREG-0313, Rev. 1 requires that reactor shutdown be initiated when there is a 2-gpm increase in unidentified leakage in 24 h. For sump level monitoring systems with the fixed-measurement interval method, the level should be monitored every 4 h or less. NRC Generic Letter 81-04 requires that the above requirements be incorporated in the plant Technical Specifications.

PECo indicates that it has been meeting this part of NUREG-0313, Rev. 1. Peach Bottom Technical Specification 3.6.C together with Peach Bottom surveillance tests already meet NUREG-0313, Rev. 1. PECO plans to incorporate the model Technical Specifications attached to NRC Generic Letter 81-04 to the "extent that it is applicable to the Peach Bottom design."<sup>9</sup>

#### IV.B.1.b. Augmented ISI Program on Nonconforming "Nonservice Sensitive" Pipes

NUREG-0313, Rev. 1 requires that nonconforming "nonservice sensitive" piping be subject to an augmented ISI program.

PECo intends to implement an augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3. (There are no ASME Code Class 2 nonconforming pipes in Peach Bottom 2 and 3.) PECO will use the Stress Rule Index, industry experience, flow conditions, and minimization of personnel radiation exposure to "establish boundary locations in certain systems which will provide necessary assurance of pressure boundary integrity and a reasonably achievable examination program."<sup>7</sup> Credit will be taken for past examinations.

#### IV.B.1.b.(3) Augmented ISI for ASME Code Class 2 Pipe Welds

NUREG-0313, Rev. 1 requires that nonconforming ASME Code Class 1 and Class 2 piping be subjected to an augmented ISI program. The augmented ISI program for ASME Code Class 1 piping differs from that



required on Class 2 piping.<sup>6</sup> Also, augmented ISI requirements differ for ASME Code Class 2 pipes to be inspected per Parts IV.B.1.b.(3) and IV.B.1.b.(4) of NUREG-0313, Rev. 1.

PECo has no ASME Code Class 2 pipes in Peach Bottom 2 and 3.<sup>7</sup> Therefore there is no need for an augmented ISI for ASME Code Class 2 piping in Peach Bottom 2 and 3.

#### IV.B.1.b.(4) Augmented ISI for ASME Code Class 2 Pipe Welds

NRC Generic Letter 81-04 requires that nonconforming ASME Code Class 1 and Class 2 piping be subjected to an augmented ISI program. The augmented ISI program for ASME Code Class 1 piping differs from that required on Class 2 piping. Also, augmented ISI requirements differ for ASME Code Class 2 pipes to be inspected per Parts IV.B.1.b.(3) and IV.B.1.b.(4) of NUREG-0313, Rev. 1.

PECo has no ASME Code Class 2 pipes in Peach Bottom 2 and 3.<sup>7</sup> Therefore there is no need for an augmented ISI for ASME Code Class 2 piping in Peach Bottom 2 and 3.

#### IV.B.2. Incorporating an Augmented ISI Program for "Service Sensitive" Piping into the Technical Specifications

NRC Generic Letter 81-04 requires that the licensee's Technical Specifications be changed to include an augmented ISI program for nonconforming piping.

PECo has indicated that its long term program included replacing selected piping with material that meets NUREG-0313, Rev. 1; and evaluating the induction heating stress improvement (IHSI) process for inhibiting propagation of IGSCC.<sup>7</sup> Therefore, PECO does not believe it is appropriate to propose Technical Specifications changes to incorporate an augmented ISI program for nonconforming piping because of this long term program to reduce augmented ISI requirements.

#### IV.B.2.b. Augmented ISI Program on Nonconforming "Service Sensitive" Pipes

NUREG-0313, Rev. 1 requires that nonconforming "service sensitive" piping be subject to an augmented ISI program.

PECo intends to implement an augmented ISI program on selected ASME Code Class 1 nonconforming piping in Peach Bottom 2 and 3. (There are no ASME Code Class 2 nonconforming pipes in Peach Bottom 2 and 3.) PECO will use the Stress Rule Index, industry experience, flow conditions, and minimization of personnel radiation exposure to "establish boundary locations in certain systems which will provide necessary assurance of pressure boundary integrity and a reasonably achievable examination program".<sup>7</sup> Credit will be taken for past examinations.

#### IV.B.2.b.(6) Augmented ISI for ASME Code Class 2 Pipe Welds

NUREG-0313, Rev. 1 requires that nonconforming ASME Code Class 1 and Class 2 piping be subjected to an augmented ISI program. The augmented ISI program for ASME Code Class 1 piping differs from that required on Class 2 piping.

PECo has no ASME Code Class 2 piping in Peach Bottom 2 and 3.<sup>7</sup> Therefore, there is no need for an augmented ISI for ASME Code Class 2 piping in Peach Bottom 2 and 3.



TABLE 4

ADDITIONAL DATA REQUIRED  
OF LICENSEE

II.C. Material Selection, Testing, and Processing Guidelines for BWRs with an Operating License

1. Identify to which nonconforming "service sensitive" pipe the IHSI technique will be applied.
2. Identify which nonconforming "service sensitive" pipe will be replaced with pipe that meets NUREG-0313, Rev. 1.
3. Identify which nonconforming "service sensitive" pipe will have neither of the above--replacement or IHSI--applied to them. Indicate what measures will be taken on these pipes to mitigate IGSCC.

IV.B.1. Incorporating an Augmented ISI Program for "Nonservice Sensitive" Piping into the Technical Specifications

1. What proportion of the nonconforming piping now in Peach Bottom 2 and 3 will be subjected to replacement on a planned basis and to IHSI?
2. What are the selection criteria for a pipe to be subjected to replacement or IHSI?

IV.B.1.a.(1) Leak Detection Methods

1. Indicate whether provisions have been made in the Peach Bottom 2 and 3 FSAR to monitor systems connected to the RCPB for signs of intersystem leakage (Subsection C.4 of Regulatory Guide 1.45).

2. Indicate whether calibration of the indicators accounts for the needed independent variables. Also indicate whether procedures for converting various indications to a common leakage equivalent are available to the operators.
3. Indicate whether the sensitivity and response time for unidentified leakage is adequate to detect a leakage rate of 1 gpm in less than 1 h. (Subsection C.5 of Regulatory Guide 1.45).

IV.B.1.a.(2) Shutdown for Leakage

Please submit the proposed changes in the Peach Bottom 2 and 3 Technical Specifications regarding leak rate limits and leakage monitoring intervals.

IV.B.1.b. Augmented ISI Program on Nonconforming "Nonservice Sensitive" Pipes

None.

IV.B.1.b.(3) Augmented ISI for ASME Code Class 2 Pipe Welds

None.

IV.B.1.b.(4) Augmented ISI for ASME Code Class 2 Pipe Welds

None.

IV.B.2. Incorporating an Augmented ISI Program for "Service Sensitive" Piping into the Technical Specifications

1. What proportion of the nonconforming piping now in Peach Bottom 2 & 3 will be subjected to replacement on a planned basis and to IHSI?

2. What are the selection criteria for a pipe to be subjected to replacement or IHSI?

IV.B.2.b. Augmented ISI Program on Nonconforming "Service Sensitive" Pipes

None.

IV.B.2.b.(6) Augmented ISI for ASME Code Class 2 Pipe Welds

None.

#### 4. REFERENCES

1. E. D. Eason et al., The Cost Effectiveness of Countermeasures to Intergranular Stress Corrosion Cracking in BWR Piping, EPRI NP-1703, February 1981, p. A-04.
2. U.S. Nuclear Regulatory Commission, Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping, USNRC Report NUREG-0313, July 1977.
3. U.S. Nuclear Regulatory Commission, Technical Report, Investigation and Evaluation of Cracking in Austenitic Stainless Steel Piping of Boiling Water Reactor Plants, USNRC Report NUREG-75/067, October 1975.
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