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James J. Fisicaro
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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Subject: Integrally Welded Attachment Additional Information
River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47

File No.: G9.5, 224.610

RBF1-95-0300
RBG-42289

Gentlemen:

The purpose of this letter is to provide further information in response to follow-up questions from the Office of Nuclear Reactor Regulation (NRR) concerning the River Bend Station (RBS) request for use of American Society of Mechanical Engineers (ASME) Code Case N-509. As you requested, attached is a detailed list of integrally welded attachments to assist in your review.

RBS requests approval for the use of this Code Case based on the technical justification used by ASME in conjunction with the development of Code Case N-509. In establishing this basis, ASME conducted a survey of the nuclear industry to determine the extent of integral welded attachment failures. The data which was collected from the survey (43 plants responded) concluded the following:

- Over the past 20 years, a total of five integral attachment failures were reported,
- The failures which were reported were identified as a result of connected support member deformation rather than during the scheduled examination of the integral attachment,
- Of the five failures, only one resulted in leakage from the pressure boundary. The root cause was determined to be design failure.

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River Bend examination results of integral attachments are consistent with, and support, the technical basis established by ASME. Of the 158 integrally welded attachments that have been examined since initial plant startup, no degradation has been reported. Based on the industry experience compiled for the justification of this Code Case, EOI is confident that application of Code Case N-509 at RBS will not adversely affect plant safety or the physical integrity of these components.

If there are any questions in regard to this information, please call Mr. Timothy Gates at (504) 381-4866.

Sincerely,

JW Leavines for

JJF/RCD/jr
attachment

xc: Mr. David L. Wigginton
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Examination Category B-H:

Item Number B8.10 (Class 1 RPV)

Total Welded Attachments		= 1 (Relief Request RR0012F)
Performed	1st Period	= 1/3 of weld
	2nd Period	= 1/3 of weld
	3rd Period	= 0
To Be Performed	3rd Period	= 1/3 of weld (with or without N-509)

Item Number B8.20 (Class 1 Pressurizer)
Total Welded Attachments = Not applicable

Item Number B8.30 (Class 1 Steam Generator)
Total Welded Attachments = Not applicable

Item Number B8.40 (Class 1 Heat Exchanger)
Total Welded Attachments = 0

Examination Category B-K-1

Item Number B10.10 (Class 1 Pipe)

Total Welded Attachments		= 34
Performed	1st Period	= 6
	2nd Period	= 7
	3rd Period	= 0
To Be Performed	3rd Period	= 21 (without N-509)
		= 6 (with N-509)

Examination Category B-K-1

Item No. B10.20 (Class 1 Pump)

Total Welded Attachments		= 4
Performed	1st Period	= 1
	2nd Period	= 2
	3rd Period	= 1
To Be Performed	3rd Period	= 0 (with or without N-509)

Item Number B10.20 (Class 1 Valve)
Total Welded Attachments = 0

Examination Category C-C

Item Number C3.10 (Class 2 Vessel)

Total Welded Attachments		= 4
Performed	1st Period	= 1
	2nd Period	= 1
	3rd Period	= 2
To Be Performed	3rd Period	= 0 (with or without N-509)

Item Number C3.20 (Class 2 Pipe)

Total Welded Attachments		= 44
Performed	1st Period	= 9
	2nd Period	= 13
	3rd Period	= 6
To Be Performed	3rd Period	= 16 (without N-509)
		= 2 (with N-509)

Item Number C3.30 (Class 2 Pump)
Total Welded Attachments = 0

Item Number C3.40 (Class 2 Valve)
Total Welded Attachments = 0

Examination Category D-A, (Class 3 Support, Reactor Shutdown)
Total Welded Attachments = 0

Examination Category D-B, (Class 3 Support, ECCS & RHS)

Total Welded Attachments		= 241
Total Selected		= 155
Performed	1st Period	= 42
	2nd Period	= 48
	3rd Period	= 19
To Be Performed	3rd Period	= 46 (without N-509)
		= 20 (with N-509)

Examination Category D-C, (Class 3 Support, Spent Fuel Cooling)
Total Welded Attachments = 0

NOTE: ASME Code Item No. C3.40 in ISI Plan Relief Request RR0005 refers to Class 2 piping attachments, as identified in the 1977 Edition of ASME Section XI Code. The 1980 Edition identifies Class 2 piping attachments as Code Item No. C3.20 (Code Item C3.40 in the 1980 Edition refers to Class 2 valve attachments). The Code Item Nos. provided in this attachment corresponds to the 1980 Edition.