PHILADELPHIA ELECTRIC COMPANY 2301 MARKET STREET P.O. BOX 8699 PHILADELPHIA, PA. 19101 (215) 841-4502 JOHN S. KEMPER VICE-PRESIDENT ENGINEEPING AND RESEARCH AUG 28 1984 Mr. A. Schwencer, Chief Licensing Branch No. 2 Division of Licensing U. S. Nuclear Regulatory Commission Washington, DC 20555 Subject: Limerick Generating Station, Units 1 & 2 Information for Materials Engineering Branch (MTEG) Regarding SER Confirmatory Issue #12 - Preservice Inspection (PSI) Program References: 1) Telecon between M. Hum (NRC/MTEB), B. Brown (EG&G Lab.) and D. Schmidt (PECo), 8/17/84 Telecon between M. Hum/C. Cheng (NRC/MTEB) and D. Schmidt (PECo), 7/20/84 Letter, J. S. Kemper (PECo) to A. Schwencer (NRC), 3) dated 7/17/84 Limerick Unit 1 PSI Relief Request No. 15, Rev. 1 Attachment: File: GOVT 1-1 (NRC) Dear Mr. Schwencer: As discussed in the reference 1) and 2) telecons, the attachment provides a revision to Relief Request No. 15. Originally transmitted by reference 3), Relief Request No. 15 has been revised to provide the requested clarification and additional information. Sincerely, V. S. Boyer Jok JSK DLS/pd08278402 See Attached Service List 8409050133 84082 PDR ADDCK 050003

Judge Lawrence Brenner Judge Peter A. Morris Judge Richard F. Cole Troy B. Conner, Jr., Esq. Ann P. Hodgdon, Esq. Mr. Frank R. Romano Mr. Robert L. Anthony Maureen Mulligan Charles W. Elliot, Esq. Zori G. Ferkin, Esq. Mr. Thomas Gerusky Director, Penna. Emergency Management Agency Angus R. Love, Esq. David Wersan, Esq. Robert J. Sugarman, Esq. Martha W. Bush, Esq. Spence W. Perry, Esq. Jay M. Gutierrez, Esq. Atomic Safety & Licensing Appeal Board Atomic Safety & Licensing Board Panel Docket & Service Section Mr. James Wiggins Mr. Timothy R. S. Campbell

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Class 2 Pressure Retaining Welds in Piping Code Item Nos. C2.1 and C2.2, Category C-F

Code Requirement

Those pipe circumferential butt welds and those longitudinal weld joints in pipe fittings included in Code Category C-F of Table IWC-2520 shall be volumetrically examined per Item Nos. C2.1 and C2.2 of Table IWC-2600. The examinations shall include 100% of the C-F welds and shall be performed completely, once, as a preservice examination requirement. Table IWC-2520 requires the examination volume to include the weld plus the base metal for distance of one-wall thickness beyond the edge of the weld.

Relief Request:

Relief is requested from the base metal volume requirement of Table IWC-2520. Radiography was utilized as the volumetric examination technique. The examination volume included the weld plus the base metal for a minimum distance of $\frac{1}{4}$ inch beyond the edge of the weld. There are $\frac{40}{4}$ circumferential and $\frac{80}{4}$ longitudinal welds associated with $\frac{20}{4}$ Main Steam elbows included in this relief request.

Justification for Granting Relief:

The integrity of the piping pressure boundary has been verified by construction code testing requirements. Shop welds were radiographed in accordance with that edition of ASME Section III in effect at the time of procurement. Field weld examinations, which include radiography and hydrostatic pressure tests, were performed in accordance with the 1974 Edition of Section III including the Addenda through Winter 1974.

Laminar indications throughout the base metal of the 20 Main Steam elbows have precluded ultrasonic testing from providing a meaningful Section XI Volumetric examination. The construction radiographs for the welds in question were reviewed and additional radiography was performed to achieve coverage in excess of the requirements of the 1980 Edition of Section XI, including the Addenda through the Winter 1981, per Figure IWC-2500-7 (Anticipated Code Edition for ISI Program). Radiography will be used for subsequent ISI. The preservice volumetric examinations have been augmented by complete liquid penetrant tests, which were performed in accordance with the 1977 Edition of Section XI, including the Addenda through Summer 1978.

Limerick Generaing Station, Unit 1
Preservice Inspection Relief Request
ASME B&PV Code, Section XI

15. Additional Information:

These 20 Main Steam elbows were fabricated from SA 515 Gr. 70 rolled carbon steel plate with specified design minimum wall thickness of .928 inches. Many of these elbows exhibit a condition of stacked mid plate indications, detectable by 0° longitudinal wave ultrasonic testing (UT). These indications are dispositioned as a combination of laminations and planar non-metallic inclusions throughout the elbow base metal. Though not rejectable to the applicable base material Code testing requirements, this condition limits the effectiveness and completeness of the angle beam UT.

The preservice examination of the welds in these 20 elbows is divided into 120 volumes. Fifty-six (56) of the volumes were examined ultrasonically (0°, 45° ax, 45° circ). A breakdown of the examinations is as follows:

Number Complete 29

Number Incomplete 27

Number with Recordable Indications 21

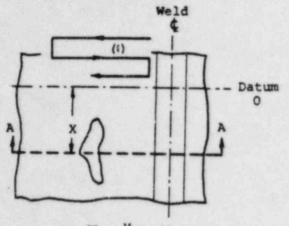
The majority of these UT examinations were performed from the pipe side due to the laminar indications detected in the elbow base metal during the 0° straight beam examination.

When the decision was made to use the construction radiographs for the preservice inspection, additional radiography was required to achieve ASME Section XI, 1980 coverage. Based on an evaluation of the radiographs and the limited UT examinations, it was determined that additional angle radiography, down the fusion line, would not be of any benefit.

For inservice inspection, both the required volumetric and surface examination will be performed. However, radiography will be used in lieu of ultrasonic testing. UT will be used for interrogative purposes when possible when a change is noted during comparison of the baseline radiographs with the subsequent inservice inspection radiographs.

Attached are the UT examination data for two welds. This information is typical of the condition found in the base metal of the 20 elbows.

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Section A-A

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SUPPLEMENT A

INDICATION REPORT SHEET STRAIGHT BEAM

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Notes:

(1) X-axis increments not to exceed allowable scan increments.

(2) End points shall be:(a) 50% of DAC (6db) for WRV Straight Beam exam, (b) equal to Remaining Back Reflection (RBR) for base material lamination exam.

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Section A-A

SUPPLEMENT A

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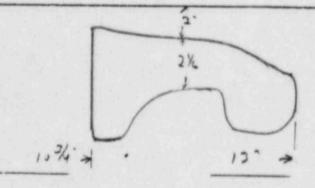
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