

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

(215) 841-4502

NOV 9 1984

JOHN S. KEMPER  
VICE-PRESIDENT  
ENGINEERING AND RESEARCH

Mr. Darrel G. Eisenhut, Director  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Docket No.: 50-352  
50-353

Subject: Limerick Generating Station, Units 1 & 2  
Inspection of BWR Stainless Steel Piping

References: 1) Generic Letter 84-11, dated April 19, 1984  
2) Letter J. S. Kemper to D. G. Eisenhut,  
dated October 5, 1983

Files: RES 26 (IGSCC)  
GOVT 1-1 (NRC)

Dear Mr. Eisenhut:

Generic Letter 84-11 (Reference 1) requests information relative to inspections for intergranular stress corrosion cracking (IGSCC) and leakage detection. The scope includes stainless steel welds, susceptible to IGSCC, in piping that is part of or connected to the reactor coolant pressure boundary (RCPB) out to the second isolation valve, in systems equal to or greater than four (4) inches in diameter with an operating temperature above 200F.

Reference 2) discusses the use of nuclear grade materials for Limerick Units 1 and 2 in the reactor coolant system, emergency core coolant systems out to the first isolation valve and the reactor water clean-up system out to the second isolation valve. Accordingly, there are no "nonconforming service sensitive" welds within the RCPB and as such, augmented inservice inspection per NUREG 0313, Revision 1, are unnecessary. This information has been reviewed by the NRC staff and reported on in the Limerick Safety Evaluation Report (NUREG-0991), Section 5.2.3.

Considering I.E. Bulletins 82-03 and 83-02, many of the ultrasonic techniques qualified at the EPRI Center have since been incorporated into Limerick examination procedures and used during the later portion of the Unit 1 preservice inspection. Examiners qualified in IGSCC detection and sizing are available at Limerick due to our participation in EPRI's sponsorship program.

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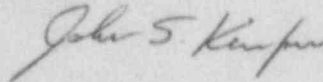
Any cracks which may be detected during normal operation or the Inservice Inspection program will be evaluated and repaired in accordance with ASME Section XI. Appropriate methods to further mitigate IGSCC in the repaired welds will be considered in the repair program.

Regarding primary system leak detection, existing methods and systems described in FSAR Section 5.2.5 are in compliance with NUREG 0313, Revision 1. Surveillance measures beyond those required by Technical Specification 3/4.4.3 are not required.

Based on the above, Limerick Units 1 and 2 are consistent with the guidelines of Generic Letter 84-11 and no modifications or further action is required at this time.

If you have any questions or comments, please do not hesitate to contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "John S. Kemper".

See Attached Service List

DLS/pd10108411

cc: Judge Helen F. Hoyt  
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Judge Richard F. Cole  
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