D. L. Caphton, Sef... Reactor Inspector
Directorate of Regulatory Operations, DRO:I

JUN 13 1974

OYSTER CREEK (DN 50-219)
INCORE PENETRATION LEAK (AO 74-34)

Review of the licensee's AO, work completed and communications to date indicates the following.

1. The licensee has determined that the failure is at a weld and does not represent a tube failure.

2. The licensee is apparently gearing up to propose rolling of the tube as a fix (To our knowledge no code case exists to permit this repair).

3. The licensee appears unable to characterize the defect in the weld. The cause of the weld failure has not yet been determined, i.e. from induced vibration, corrosion or other. The generic aspects are also unknown.

4. RO:I has examined P. T. records for the affected weld (28-05 location). The weld was P. T. tested, accepted, then subsequently repaired (rationale unknown) and again PT tested, a 1/16" linear indication removed and then accepted again.

I believe our position in this matter should be as follows:

1. Until the failure mechanism is defined other comparable welds can not and should not be excluded from generic considerations. I have doubts that the mechansim causing the weld crack will be forthcoming based on the results to date. This presupposes an extensive monitoring and test program which should also include vibrational measurements on the affected in core penetration and more stringent surveillance an all vessel penetrations.

2. The weld failure in and of itself represents an unreviewed safety question because the weakened area now increases the probability of failure and ejection.

Further, the implementation of a tube rolling fix without Commission reviews and approval will constitute in my view a second unreviewed safety question pursuant to 50.59 2(1). In this regard

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I believe JCP&L should sitdown with DL and present their total package of the evaluation and justification.

3. A catastrophic failure and ejection of the instrument tube is an analyzed accident in the FSAR . With a cracked weld the potential for ejection is increased. Licensing should be requested to reevaluate the control rod drive housing support system in light of any necessary design changes as may be required, to preclude postulated ejection.

E. G. Greenman
Reactor Inspector

cc: J. P. O'Reilly
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