BOSTON EDISON COMPANY 800 BOYLSTON STREET BOSTON, MASSACHUSETTS 02199

November 3, 1984 BECo 84-191

WILLIAM D. HARRINGTON BENIDA VICE PRESIDENT NUCLEAR

> Harold R. Denton, Director Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission Washington, D. C. 20555

> > License No. DPR-35 Docket No. 50-293

Supplemental Response to IGSCC Inspection Order Confirming Shutdown

Reference:	(a)	Beston Edison Company Letter (W. D. Harrington) to NRC (H. R. Denton), dated September 11, 1984
Attachments:		Isometric Drawing ISI-I-10-1 Pilgrim Nuclear Power Station - Recirculation Nozzle

(2) Pilgrim Nuclear Power Station - Recirculation Nozzle Repair Program and Hydrogen Water Chemistry Materials Qualification

Dear Sir:

1

In Reference (a), Boston Edison Company (BECo) submitted its response to IGSCC Inspection Order Confirming Shutdown (Order) dated August 26, 1983. Subsequent to that submittal BECo has identified five areas in which further clarification and/or changes are recommended. This letter also includes a non-proprietary version of <u>Pilgrim Nuclear Power Station - Recirculation</u> <u>Nozzie Repair Program and Hydrogen Water Chemistry Materials Qualification</u> for your use. A proprietary version of this report had been submitted to you in Reference (a).

BECo is clarifying five areas of the Reference (a) submittal. First, weld 10-1B-14A in the Residual Heat Removal System outside the drywell, was reported to have indications. The section of pipe in which this weld is located has now been replaced and a boat sample has been taken to further analyze the indications. The results show that the indications are attributed to root geometry, specifically, lack of fusion and not IGSCC.

Second, weld 14-B-21 in the Core Spray System, outside the drywell, was reported to have indications and an evaluation was planned to provide justification for continued operation. Subsequent to our letter, sufficient material has been located to remove the section of pipe which contained this weld. This weld has been replaced and a laboratory examination has been made of the removed weld. The results show that the indications are counter bore machining marks on the I.D. and a lamination within the wall thickness of the adjacent base metal and not IGSCC.

Third, isometric drawing ISI-I-10-1 originally showed that the portion of line from penetration X-51A to valve 29A will be replaced with 316 NG stainless steel material. This portion of line will not be replaced and never was intended to be replaced. A corrected drawing is enclosed (Attachment 1) in

this submittal.

8411160174 841109 PDR ADDCK 05000293 PUR Q

1001 finit

Haro'd R. Denton, Director November 9, 1984 Page 2

Fourth, BECo stated its intention to follow the guidelines of the Boiling Water Reactor Owners Group (BWROG) on Pipe Cracking for augmented inspections of safe-end to nozzle "butter" welds. BECo now intends to apply these guidelines for future augmented inspections to all welds that have Alloy 182 butter. This specifically applies to the following welds in the Core Spray System: 14-A-1, 14-A-3, 14-A-10A, 14-B-1, 14-B-3, and 14-B-10A. Therefore, our present plan is to perform this examination as a base line for future examination and not to examine these welds by x-ray as previously reported.

Finally, last pass heat sink welding will be performed on the following welds: 14-B-16, 14-A-16, 12-O-23, 10-1B-13 and 10-1A-13. These welds connect the new 316 NG piping material to existing 304 piping material at the containment penetrations inside the drywell.

Receipt of the information contained in this submittal should be sufficient for you to complete your review and grant favorable disposition to the Order.

Pilgrim Station is presently scheduled to startup on November 27, 1984. Therefore, we hereby request you rescind the Order by November 27, 1984.

Very truly yours,

WD Harington

Attachments

Commonwealth of Massachusetts) County of Suffolk)

Then personally appeared before me W. D. Harrington, who, being duly sworn, did state that he is Senior Vice President - Nuclear of the Boston Edison Company, the applicant herein, and that he is duly authorized to execute and file the submittal contained herein in the name and on behalf of the Boston Edison Company and that the statements in said submittal are true to the best of his knowledge and belief.

My Commission expires: JUNE 20, 1991

Dorochy Mil

cc: Dr. T. E. Murley, Regional Administrator U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406

> Mr. R. C. DeYoung, Director Office of Inspection and Enforcement U. S. Nuclear Regulatory Commission Washington, D. C. 20555

