

Norelius



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

APR 1 1983

MEMORANDUM FOR: D. H. Eisenhut, Director, Division of Licensing, NRR

FROM: C. E. Norelius, Director, Division of Project and Resident Programs

SUBJECT: TRANSFER OF RESPONSIBILITY - CONTAINMENT VESSEL WELDS NOT IN STRICT COMPLIANCE WITH FSAR COMMITMENTS - PERRY NUCLEAR POWER PLANTS, UNITS 1 AND 2

This memorandum is written to transfer responsibility for NRC action from Region III to the Division of Licensing for the resolution of Cleveland Electric Illuminating Company's (CEIco) deviation from FSAR commitments for the Perry Nuclear Power Plant (PNPP), Units 1 and 2, containment vessel.

The PNPP FSAR specifies the applicable code for the steel containment is ASME Section III, Subsection NE. The FSAR further specifies that the steel containment is not ASME Code stamped; however, all other requirements of the Code applicable to Class MC containment vessels are met.

As a result of Region III inspection findings, CEIco conducted a re-review of previously accepted containment shell radiographs and determined many of these radiographs were in fact rejectable. CEIco's disposition of certain of the questionable/rejectable weld joints is to "use-as-is". This disposition was submitted to the State of Ohio with a request for approval to build and stamp the containment vessels to an "Ohio Special" classification. The State, the National Board and Hartford Steam Boiler Insurers concurred with this disposition.

We understand NRR is in the process of evaluating the use of concrete placed in the PNPP Reactor Building annulus areas as a strength-bearing structure. Since this concrete is being used to reduce stresses and vibration in the containment shell, we feel it would be appropriate for NRR to determine the adequacy of the shell plate welding deviation concurrent with their evaluation of the concrete.

- We request that NRR assess the technical and safety aspects of CEIco's proposal to deviate from ASME Code requirements and to disposition the welds "use-as-is".

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The following summary of events and a reference to applicable documents (copies are included as enclosures to this memorandum) relating to this matter are included to aid in your review.

- The CEI Co deviation from FSAR commitments was identified during a review of inadequacies in welding that were brought to the attention of Region III. This review was conducted at the Perry site in February, 1982, (Reference Inspection Report Nos. 50-440/82-03; 50-441/82-03). During this inspection, discrepancies were identified with the acceptability of containment vessel shell plate radiographs. In response to these findings, CEI Co re-reviewed all of the previously accepted radiographs and subsequently submitted a 10 CFR 50.55(e) report (Reference Letters (RDC 53 (82)) CEI Co (D. R. Davidson) to Region III (J. G. Keppler) dated May 3, 1982, August 31, 1982, and September 30, 1982. A followup inspection was conducted to examine the results of the licensee's evaluation. The Region III inspector's findings are documented in Inspection Report Nos. 50-440/83-02; 50-441/83-02. As a result of a telephone discussion with the licensee's site technical staff, additional information was provided to the Region III staff to aid us in our review of this deviation (Reference handwritten memo G. Leidich (CEI Co) to K. Ward/D. Danielson (Region III) dated February 7, 1983, with attachments A through G). Region III conducted a special inspection at the site and reviewed the previously accepted radiographs (the lower four courses) of the weld joints in question. (Reference Inspection Report Nos. 50-440/83-09; 50-441/83-08) This inspection report includes the results of the radiographic film evaluations (accept/reject) for each of the films in question for both Units 1 and 2. The evaluations are those made by CEI Co's NDE Level III and an Authorized Inspection Agency, as well as those made by the Region III NDE Specialist.

The Region III staff has discussed the above matter with appropriate NRR staff personnel. Region III will continue to follow activities at the site and will provide information to NRR as necessary to support their evaluation and analysis. CEI Co has expressed a desire to meet with the NRC technical staff to discuss the details of their evaluation. Members of the Region III staff would be available to attend this meeting. Our contact for coordinating the regional effort is D. H. Danielson (FTS 384-2610).

C. E. Norelius

C. E. Norelius, Director
Division of Project and
Resident Programs

Enclosure: As Stated



Has been sent to all president
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APR 20 1983

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MEMORANDUM FOR: Charles E. Norelius, Director
Division of Project and Resident
Programs

FROM: Darrell G. Eisenhut, Director
Division of Licensing

SUBJECT: NRR POSITION ON COMPONENT OPERABILITY WHEN A
DIESEL GENERATOR IS INOPERABLE

REFERENCE: Memo from C. E. Norelius to D. G. Eisenhut, dated
February 16, 1983; Subject: "Request for Technical
Assistance - Technical Specification Interpretation".

Your memorandum to me dated February 16, 1983 (see reference) requested an interpretation by NRR on the subject of operability. The requested interpretation was whether the loss of emergency power to a system would render that system inoperable for the purpose of satisfying another system LCO. Your memorandum included a specific example dealing with the core spray system and the high pressure coolant injection system at the Duane Arnold facility.

It is our position that, in general, a system may be considered operable for the purpose of satisfying its own LCO and that of another system if only its emergency power supply is inoperable. This position assumes that all the provisions of Technical Specification 3.0.5 in Enclosure 1 of my April 10, 1980 letter to All Power Reactor Licensees are also satisfied, i.e., a system may be considered operable for the purpose of satisfying its applicable LCO when its emergency power source is inoperable provided the system's corresponding normal power source is operable, and its redundant train is also operable. These provisions have been incorporated into the Duane Arnold Technical Specifications as a clarification to the definition of Limiting Conditions for Operation. We realize that this position may result in a plant not being capable of fully satisfying the single failure criterion while operating in the degraded mode. However, we consider such operation to be acceptable since it would be of limited duration and the probability of an accident occurring with a concurrent failure of the remaining operable system is remote.

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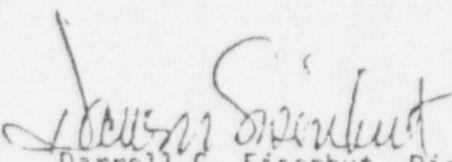
Contact: D. Brinkman, x24707

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In your memorandum, you specifically asked: "With the Core Spray System degraded by loss of its emergency power source, is the Core Spray System to be considered operable to meet the High Pressure Coolant Injection System LCO?" Duane Arnold Technical Specification 3.5.D.2 is applicable to this example; it permits reactor operation to continue for up to seven days providing that during such seven days all active components of the ADS subsystem, the RCIC system, and LPCI subsystem and both core spray subsystems are operable. In accordance with our position, both core spray subsystems would be considered operable.

It should be noted, however, that our position is not intended to supersede the provisions of any technical specification which specifically requires the operability of diesel generators. For example, Duane Arnold Technical Specification 3.5.A.2 permits reactor operation to continue for up to seven days with one core spray subsystem inoperable provided the other core spray subsystem, the active components of the LPCI subsystem and the diesel generators are operable. Therefore, if one core spray subsystem and one diesel generator were inoperable, our position would not be applicable and continued operation would not be acceptable since Technical Specification 3.5.A.2 specifically requires the diesel generators to be operable.


Darrell G. Eisenhut, Director
Division of Licensing