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RULES & DIR. BRANCH
US NRC

63 FR 15233
March 30 1998
(8)
ComEd

May 29, 1998

Chief, Rules and Directives Branch
Division of Administrative Services
U.S. Nuclear Regulatory Commission
Mail Stop T6-D59
Washington, DC 20555-0001

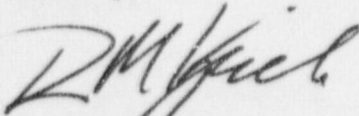
Subject: Comments on Proposed Generic Communication: "Augmented
Inspection of Pressurized Water Reactor Class 1 High Pressure Safety
Injection Piping"

Reference: Federal Register Volume 63 Number 60

This letter provides the Commonwealth Edison Company (ComEd) comments on the
subject Nuclear Regulatory Commission (NRC) proposed generic communication.

Regarding the Discussion Section, we consider that the NRC should specify that the
required volumetric examination should apply only to future inspections and to full
penetration welds on PWR Class 1 High Pressure Safety Injection (HPSI) piping.
Volumetric examination should not be required on socket welds and pipe branch
connections because of inherent geometrical constraints. This is consistent with the
American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code,
Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components"
requirements for Class 2 HPSI piping which requires volumetric and surface
examinations for full penetration welds.

Sincerely,



R. M. Krich
Vice President - Regulatory Services

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PDR I&E
MISC PDR

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A Unicom Company

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