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SUBJECT: Requests extension of exam interval for GL 88-01 category C welds after completion of stress improvements process,from within 2 refueling outages of stress improvement to within 4 yrs after stress improvement.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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September 27, 1995
GO2-95-201

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21**
EXTENSION OF GENERIC LETTER 88-01 CATEGORY C
EXAMINATION INTERVAL

This letter requests an extension of the examination interval for Generic Letter 88-01 category C welds after the completion of the stress improvement process. It is requested that the examination required within 2 refueling outages of stress improvement be changed for WNP-2 to within 4 years after stress improvement. This will place examination of the remaining category C welds in refueling outage R13 (Spring, 1998) along with the examination of the reactor pressure vessel (RPV) nozzle-to-vessel welds. These jobs share several related activities and if performed in the same outage could significantly reduce the combined personnel exposure from both jobs.

WNP-2 Technical Specifications (TS 4.0.5.f) requires that examinations within the scope of Generic Letter 88-01 be performed in accordance with the NRC staff position on schedules included with the generic letter or with alternate measures approved by the NRC. The schedule for category C welds, those welds receiving stress improvement after 2 years of operation, is to perform examination within 2 refueling cycles of the stress improvement and then every 10 years (Generic Letter 88-01 Table 1).

WNP-2 performed the mechanical stress improvement process (MSIP) on 25 safe-end-to-nozzle category D welds at refueling outage R9 (Spring, 1994). As part of the MSIP process, all treated welds received ultrasonic examination per the staff's position on Inspection Methods and

Personnel as presented in Generic Letter 88-01. Because of the R9 MSIP, these welds are now classified as category C and require examination again within 2 refueling outages of R9. During refueling outage R10 (Spring, 1995), one refueling outage after the MSIP was performed, eight (8) of the treated welds received examination per the Generic Letter and no unacceptable indications were identified.

The subject welds have been examined per the staff's position in Generic Letter 88-01 at least twice within the last five refueling cycles with no unacceptable indications detected. See the attachment to this letter for a summary of the welds' fabrication and inspection history.

Personnel exposure for performing the examinations on these welds was 57 person-rem at R7 and 85 person-rem at R9. Based on this historical data, the estimated exposure to perform examinations on the remaining 17 welds is 70 person-rem. The majority of the exposure is from the opening and closing of the shield doors (including installation and removal of insulation and scaffolding) to gain access to the welds. The 6 RPV nozzle-to-vessel welds scheduled for R13 also require opening and closing of shield doors. The dose to open these 6 doors is estimated at 25 person-rem. Performing both these tasks in the same outage would thus avoid approximately 25 person-rem of exposure.

The current inspection schedule is based on WNP-2 operating on a 12-month refueling cycle to accommodate local power availabilities, which is shorter than typical boiling water reactors (BWRs) that operate on 18- or 24-month cycles. Therefore, basing inspection schedules solely on fuel cycle interval, instead of on a time period, would require the welds to be inspected sooner at WNP-2 than is required at other BWRs. If WNP-2 were on a 24-month refueling cycle, the second refueling outage after an intergranular stress corrosion cracking (IGSCC) mitigation treatment by the stress improvement technique would occur in the Spring of 1998, which is consistent with this request.

Based on the above information, the Supply System believes that the requested schedule change to a Spring, 1998 date for completion of the Category C weld inspections provides the best combination of weld inspection in conjunction with application of ALARA considerations. The Supply System also believes that the requested change is consistent with the intent of the Generic Letter as it is applied at 24 month operating cycle plants. The category C weld inspection frequency would still be on a ten year cycle after this inspection as required by Generic Letter 88-01.

Staff review and approval is requested by November 27, 1995 to support Spring, 1996 outage planning.

Should you have any questions or desire additional information regarding this matter, please call me or D.A. Swank at (509) 377-4563.

Sincerely,

J.V. Parrish (Mail Drop 1023)
Vice President, Nuclear Operations

DPR/dpr
Attachment

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

ATTACHMENT

GENERIC LETTER 88-01 CATEGORY C WELDS

Identification No.	Year/Outage Weld Examined												Proposed Exam Outage	ISI Diagram	Notes (1)
	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998		
	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10	R11	R12	R13		
4JP(NZ)A-1							X		X				X	RPV-101	See note 2
4JP(NZ)B-1							X		X				X	RPV-101	See note 2
24RRC(2)A-1							X		X				X	RRC-101	See notes 3 and 4
12RRC(1)-N2A-6							X		X				X	RRC-101	See note 5
12RRC(1)-N2B-6							X		X				X	RRC-101	See note 5
12RRC(1)-N2C-6							X		X				X	RRC-101	See note 5
12RRC(1)-N2D-6							X		X				X	RRC-101	See note 5
12RRC(1)-N2E-6							X		X				X	RRC-101	See note 5
24RRC(2)B-1							X		X				X	RRC-102	See notes 3 and 4
12RRC(1)-N2F-6							X		X				X	RRC-102	See note 5
12RRC(1)-N2G-6							X		X				X	RRC-102	See note 5
12RRC(1)-N2H-6							X		X				X	RRC-102	See note 5
12RRC(1)-N2J-6							X		X				X	RRC-102	See note 5
12RRC(1)-N2K-6							X		X				X	RRC-102	See note 5
12RFW(1)AC-13	X						X	X	X	X				RFW-101	See note 6
12RFW(1)AB-11		X					X		X	X				RFW-101	See note 6
12RFW(1)AA-11			X				X		X	X				RFW-101	See note 6
12RFW(1)BD-11				X			X		X	X				RFW-102	See note 6
12RFW(1)BE-11					X		X		X	X				RFW-102	See note 6
12RFW(1)BF-14						X	X		X	X				RFW-102	See note 6
10HPCS(1)-4							X		X	X				HPCS-101	See note 6
10LPCS(1)-4		X					X		X	X				LPCS-101	See note 6
12LPCI(1)A-6		X					X		X				X	RHR-101	See note 6
12LPCI(1)B-6							X		X				X	RHR-102	See note 6
12LPCI(1)C-6							X		X				X	RHR-103	See note 6

NOTES

1 Unless otherwise noted, all material is regular grade type 304 or 316.

2 SA 508 Cl 2 nozzle, buttered with Inconel 182 weld metal, welded to 336 F8 (0.025 C) Safe end with Inconel 82 weld metal

3 SA 336 F8 Safe end with 0.025 % carbon

4 SA 508 Cl 2 nozzle, buttered with Inconel 182 weld metal. Post weld heat treated. Welded to SA 336 F8 Safe end (with 0.020 carbon content) with Inconel 82 weld metal for root/hot pass and Inconel 182 for balance.

5 SA 508 Cl 2 nozzle, buttered with Inconel 182. Original Inconel 600 safe-end removed. New 316L safe end with Inconel 182 butter on the nozzle side of the safe end welded to original Inconel 182 buttering with Inconel 82 weld metal for the butt weld.

6 Inconel 182 buttering on safe end welded to Inconel 600 SE with Inconel 182 weld metal root/hot pass and Inconel 182 for balance.