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 50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylvania 05000388
 AUTH. NAME AUTH. AFFILIATION
 CURTIS, N.W. Pennsylvania Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Responds to Generic Ltr. 84-11, "Insp of BWR stainless steel piping." Induction heating stress improvement & ultrasonic testing or radiography will be performed on Unit 1 welds during first refueling outage.

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Pennsylvania Power & Light Company

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Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215/770-7501

JUN 01 1984

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO GENERIC LETTER 84-11
ER 100450 FILE 841-9
PLA-2210

Docket Nos. 50-387
50-388

Dear Mr. Schwencer:

The following is in response to Generic Letter 84-11, "Inspections of BWR Stainless Steel Piping". The response is in two parts addressing both Unit 1 and Unit 2.

Part I - Susquehanna SES Unit 1 Response

1. During the first refueling outage, scheduled for March 1985, Pennsylvania Power & Light Company will perform induction heating stress improvement (IHSI) on 136 welds which are considered non-conforming prior to IHSI treatment. These welds will include nine one inch branch line welds where IHSI is feasible. Also during the first refueling outage and after IHSI has been performed the non-conforming/conforming service sensitive welds will receive augmented inspections to the extent defined in NUREG 0313. These welds will be either UT tested or radiographed using the Miniature Linear Accelerator (MINAC). Since IHSI will be performed on these welds, future augmented inspection requirements of NUREG 0313 no longer apply. Future inspections on these welds will be in accordance with the Inservice Inspection Program of Section XI of the ASME Boiler and Pressure Vessel Code.
2. The examiners will be available per contractual requirements and will be qualified as follows:
 - a. All level 2 and level 3 UT examiners performing UT examinations on the IGSCC susceptible welds will have demonstrated competence in accordance with IEB 83-02 as a prerequisite to performing these examinations at Susquehanna SES and level 1 examiners will demonstrate field performance capability.

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- b. All level 2 and level 3 radiographic examiners using the MINAC will demonstrate competence in accordance with the intent of IEB 83-02 and level 1 examiners will demonstrate field performance capability when the equipment has been qualified to the intent of IEB 83-02.
- 3. Pennsylvania Power & Light Company is not planning any special surveillance measures for primary system leak detection beyond those measures already required in the Technical Specifications. The following is Pennsylvania Power & Light Company's position on Attachment 1, "Leak Detection and Leakage Limits", of Generic Letter 84-11.
 - a. The leak detection system at Susquehanna SES is sufficiently sensitive to detect and measure small leaks in a timely manner and to identify the leakage sources within practical limits.
 - b. Since induction heating stress improvement has been used on Unit 2 and will be used on Unit 1 (see paragraph 1.) susceptible welds, the requirement to shutdown the unit immediately when the unidentified leakage is in excess of 2 gpm in a 24 hour period is overly restrictive.
 - c. The requirement for the outage time for inoperable leakage measurement instruments is overly restrictive. These instruments should be allowed to be inoperable up to 7 days provided that at least one leakage measurement instrument system is operable. This time period is consistent with other technical specifications for equipment out of service.
 - d. The unidentified leakage at Susquehanna SES is as defined in Part D to Attachment 1 of the Generic Letter.
 - e. Visual examination (VT-2) for leakage of the reactor coolant piping should be required in accordance with the time interval as stated in the ASME Boiler and Pressure Vessel Code and not each time the containment is deinerted. Requiring a visual examination each time the containment is deinerted puts an unnecessary strain on manpower, increases radiation exposure, and extends outage time with very little benefit.
- 4. The initial NDE inspection of piping susceptible to IGSCC is scheduled for the first refueling outage. The Susquehanna units were not required to perform inspections under IE Bulletins 82-03, 83-02 or the August 26, 1983 order.
- 5. The remedial measures to be taken if cracks are discovered in future inspections will be consistent with Attachment 2 of Generic Letter 84-11 or other measures acceptable to the NRC at that time.

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Part II - Susquehanna SES Unit 2 Response

1. During Unit 2 construction, IHSI was performed on non-conforming welds. Some additional welds (20 large pipe welds and 9 small pipe welds) will receive IHSI and those welds which are subject to the augmented inspection requirements of NUREG 0313 will be post-IHSI examined where feasible. These tasks will be completed prior to startup following the first refueling outage on Unit 2 and are currently scheduled for completion prior to Unit 2 commercial operation. The initial inspection of piping will be during the first refueling outage scheduled for late 1986. For those welds which have been treated with IHSI, the requirements for augmented inspection per NUREG 0313 are not applicable. These welds will be inspected in accordance with the Inservice Inspection Program of Section XI of the ASME Boiler and Pressure Vessel Code.
2. See Part I above.
3. See Part I above.
4. See Part I above.
5. See Part I above.

If you have any questions or concerns, please contact us.

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction-Nuclear

cc: R. L. Perch NRC

AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

I, NORMAN W. CURTIS, being duly sworn according to law, state that I am Vice President, Engineering & Construction-Nuclear of Pennsylvania Power & Light Company and that the facts set forth on the attached response by Applicants to Generic Letter 84-11 are true and correct to the best of my knowledge, information and belief.

Norman W. Curtis
Norman W. Curtis
Vice President,
Engineering & Construction-Nuclear

Sworn to and subscribed
before me this 15th day
of June, 1984.

Martha C. Barto
Notary Public
MARTHA C. BARTO, Notary Public
Allentown, Lehigh County, Pa.
My Commission Expires Jan. 13, 1986