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 DENTON, H. R. Office of Nuclear Reactor Regulation, Director (post B51125  
 TAM, P. Division of Pressurized Water Reactor Licensing - A (post B

SUBJECT: Confirms B60417 telcon agreements SER (NUREG-1057) Open  
 Item 4 concerning preservice insp program, including  
 (augmented inservice insp) exam of 2-inch welds & smaller.

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## Duquesne Light

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May 13, 1986

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, DC 20555

ATTENTION: Mr. Peter Tam, Project Manager  
Division of PWR Licensing - A  
Office of Nuclear Reactor Regulation

SUBJECT: Beaver Valley Power Station - Unit No. 2  
Docket No. 50-412  
SER Open Item (4)

REFERENCE: 1) BVPS-2 Safety Evaluation Report, NUREG-1057,  
October 1985  
2) DLC Letter 2NRC-5-154, dated December 26, 1985  
3) NRC Letter to DLC, dated January 24, 1986  
4) DLC Letter 2NRC-6-034, dated April 9, 1986

GENTLEMEN:

As a follow-on to submittal of the BVPS-2 Preservice Inspection Program (reference 2), Duquesne Light Company (DLC) held a telecon with your staff (Messrs. P. Tam, G. Johnson and S. Lee) on April 17, 1986 relative to PSI examination of component supports and Break Exclusion Zone (Augmented ISI) examination of welds 2 inch and smaller size. Agreements reached on the examinations relative to the above are as follows:

1. Preservice Inspection of Component Supports  
Applicable to IWF - 2200(b)

The ASME Section XI Code, 1980 Edition through Winter 1980 Addenda (BVPS-2 PSI Program Baseline) states in IWF-2200(b): "All examinations shall be performed following the initiation of hot functional tests."

In the DLC submittal PSI Program Document No. NCDP 2.13, paragraph 6.7.3, the following was stated as a clarification: "DLC applies the IWF-2200(b) criteria to "Hot" (>200°F) systems."

The discussion with your staff established and clarified that the concern for application of IWF-2200(b) was for component supports subject to thermal stresses and/or movements, and was therefore

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THE  
OFFICE OF THE  
ATTORNEY GENERAL  
STATE OF NEW YORK

IN SENATE  
JANUARY 10, 1912

REPORT  
OF THE  
COMMISSIONER OF THE LAND OFFICE

FOR THE YEAR  
ENDING DECEMBER 31, 1911

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applicable to those systems which are subjected to "Hot" temperatures. The establishment of a system operating temperature of ">200°F" as being "Hot" was agreed upon. Therefore no change to NCDP 2.13 is necessary.

2. Preservice Inspection Examination Requirements of Component Supports applicable to IWF-2200(a) vs. IWF-2510(a) and (b)

The ASME Section XI Code, 1980 Edition through Winter 1980 Addenda (BVPS-2 PSI Baseline) states in IWF-2200(a): "All examinations listed in IWF-2500-2 shall be performed completely, once, as preservice examination."

In the DLC PSI Program procedures for component supports (not including snubbers, which are examined 100% in PSI) and in DLC Program Procedure NCDP 2.13.6, paragraph 6.1.2 (submitted with BVPS-2 PSI Program, reference 2), selection of component supports utilizes IWF-2510(a) and IWF-2510(b).

The discussion with your staff established and clarified that the selection of components supports for PSI utilizing IWF-2510(a) and (b) will meet the intent of providing an examination baseline for In-service Inspection. DLC also indicated that in addition to utilizing multiple stream (train) and multiple components criteria for establishment of "all in one train" of component supports, all Class 1 component (piping) supports applicable to Class 1 integral (piping) attachments, which were selected from any of the multiple trains, would also be included in the examination requirements. Procedure 2.13.7 will be changed to reflect the above.

3. Preservice Inspection of 2 inch and Smaller Welds in Break Exclusion Zone (Augmented Inspection)

The BVPS-2 FSAR (section 6.6.8) and DLC submitted PSI Procedure NCDP 2.13, paragraph 6.5.5 identified Break Exclusion Zone (Augmented ISI) and extent of examinations. DLC submitted PSI Procedure NCDP 2.13.5, step 6.2.2.5, "Limitations/Clarifications", further indicated that: "Miscellaneous branch connections and socket welds (1 1/2 inch. and 2 inch. sizes) are not included in the PSI examination."

The agreement reached is based on the following:

- (a) The specific requirements for Break Exclusion Zone piping welds is for a "volumetric only" examination (ultrasonic methods at BVPS-2).
- (b) Obtaining meaningful results by ultrasonic methods for miscellaneous branch connections and socket welds (1 1/2 inch and 2 inch sizes) is highly improbable.
- (c) The intent of PSI examination as a baseline for ISI is to provide for trending service-induced degradation.



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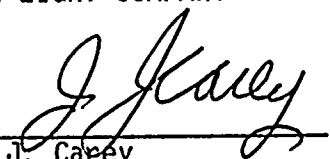
The agreement reached is to perform surface examination with sampling criteria compatible with Class 2 weld selection criteria for PSI (i.e. 10% sampling, prorated).

An FSAR Amendment to paragraph 6.6.8 and revision to NCDP 2.13.5 will be forthcoming to incorporate the above clarifications. In-process examination of Break Exclusion Zone piping welds will also incorporate this criteria.

The above items should be considered part of the PSI Program submittal which is presently under staff review and for which a confirmatory status of the part of SER Open Item (4) concerning PSI has been requested by July 1, 1986 (reference 4).

DUQUESNE LIGHT COMPANY

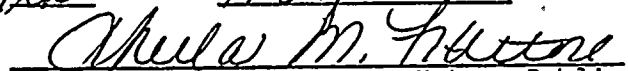
By

  
J. J. Carey  
Vice President

JJS/jdw  
AR/NAR

cc: Mr. P. Tam, Project Manager  
Mr. J. M. Taylor, Director (3)  
Mr. W. Troskoski, Sr. Resident Inspector  
Mr. L. Prividy NRC Resident Inspector  
INPO Records Center  
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SUBSCRIBED AND SWORN TO BEFORE ME THIS  
4th DAY OF May, 1986.

  
Notary Public

SHEILA M. FATTORE, NOTARY PUBLIC  
SHIPPINGPORT BORO, BEAVER COUNTY  
MY COMMISSION EXPIRES OCT. 23, 1989  
Member, Pennsylvania Association of Notaries

1. The purpose of this document is to provide information regarding the activities of the [redacted] in the [redacted] area.

2. The [redacted] has been observed in the [redacted] area, and it is believed that it is engaged in [redacted] activities.

3. It is recommended that the [redacted] be kept under close surveillance, and that any further information regarding its activities be reported immediately to the [redacted].

4. APPROVED: [redacted]

5. [redacted]  
[redacted]  
[redacted]

6. [redacted]  
[redacted]  
[redacted]  
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