

UNION ELECTRIC COMPANY  
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VICE PRESIDENT

June 27, 1979

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Mr. Gaston Fiorelli, Chief  
Reactor Construction & Engineering Support Branch  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

ULNRC- 320

Dear Mr. Fiorelli:

INSPECTION REPORT NO. 50-483/79-04

This is in response to your letter of May 30, 1979 reporting results of an inspection at Union Electric Company's Callaway Plant Site on April 24-26, 1979 and as detailed in inspection report number 50-483/79-04.

None of the material in the inspection report or in this response are considered proprietary by Union Electric Company.

The response listed below corresponds to the item listed in Appendix A, Notice of Deviation, of the inspection report.

Deviation (483/79-04-01)

SNUPPS PSAR Section 3.12 commits to Regulatory Guide 1.19, August 11, 1972, Nondestructive Examination of Primary Containment Liner Welds, except for the following minor deviations, one of which is, "All nondestructive examination methods and techniques are in accordance with Section V of the ASME Boiler and Pressure Vessel Code, except for radiography which is in accordance with Appendix X of ASME Section III." (Appendix X to Section III and Article 2 of Section V are acceptable methods of meeting the requirements of Regulatory Guide 1.19, since their examination requirements are equivalent to those required by the regulatory guide.)

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Appendix X to Section III of the ASME Boiler and Pressure Vessel Code Table X-3325.1-1, Standard Penetrameter Sizes, requires that a penetrameter for weld thickness range of over 1/4" through 3/8" be of a thickness of 0.0075" and designated a No. 7 penetrameter. The liner plate is 1/4" thick.

Contrary to the above, Bechtel Specification No. 10466-C151(Q), Paragraph 7.5.1.a requires that liner seam welds be examined radiographically in accordance with the requirements of Article 3, ASME Section V, which requires in Table T-320, Thickness Penetrameter Designations and Essential Holes, that a penetrameter for a single wall material thickness of over 1/4" through 3/8" be a size No. 12, which has a penetrameter thickness of 0.012". This No. 12 penetrameter is 60% thicker than the No. 7 penetrameter that is specified in Appendix X to Section III of the ASME Boiler and Pressure Vessel Code.

a. CORRECTIVE ACTION AND RESULTS ACHIEVED:

Regulatory Guide 1.19, Section C.2.a, references Subsection NE-5120 of the ASME Code. Changes made in 1973 to the Code made this reference incorrect. The response to Regulatory Guide 1.19 set out in PSAR Section 3.12 was intended to correct the reference to NE-5120 and was also intended to apply only to Regulatory Guide, Section C.2.a. However, a literal interpretation of the PSAR wording does not reflect these intended clarifications.

Paragraph C.1.a of Regulatory Guide 1.19 pertaining to nondestructive examination of liner seam weld states, these welds should be examined radiographically in accordance with the techniques prescribed in Section V of the ASME Code.

Section V of the ASME Code, 1974 edition, contains two articles (Article 2 and Article 3) each titled, "Radiographic Examination". The subject deviation basically concerns which article applies.

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Although SNUPPS is not committed to Section III Division 2 of the 1975 edition of the ASME code, "Concrete Reactor Vessels and Containments", it provides in paragraph CC-5531.1, "Examination of Liners - Radiographic Examination", that radiographic examination shall be performed in accordance with Article 3 of Section V which is consistent with SNUPPS specification requirements.

Article 3 of Section V includes requirements for radiographic examination in circumstances where the referencing section of the Code permits greater latitude in film selection and can tolerate less sensitivity and less complete documentation than required by Article 2. Table T-320 of Article 3 is consistent with Bechtel specification No. 10466-C151(Q).

b. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER NONCOMPLIANCE:

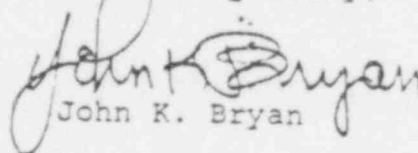
In the FSAR, when addressing Regulatory Guide 1.19, a clarifying statement will be made that Section V Article 3 of the ASME Code applies to containment liner seam weld examinations and Section III, Subsection NE and Appendix X applies to containment weld examinations at penetrations, airlocks and access openings.

c. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Compliance with Regulatory Guide 1.19 has been achieved. The above-described clarification of our commitment to Regulatory Guide 1.19 will be included in the FSAR.

If you have any questions regarding this response or additional information is required, please let me know.

Yours very truly,

  
John K. Bryan

PWG/jds

cc: E. R. Schweibinz  
W. A. Hansen

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