

Nuclear

GPU Nuclear Corporation
One Upper Pond Road
Parsippany, New Jersey 07054
201-316-7000
TELEX 136-482
Writer's Direct Dial Number:

February 21, 1990
5000-90-1891

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

Subject: Oyster Creek Nuclear Generating Station (OCNGS)
Docket No. 50-219

IGSCC Inspection Plan - RWCU

References: (1) NRC Ltr., dated 2/16/89
(2) GPUN Ltr. 5000-88-1605, dated 8/1/88
(3) GPUN Ltr. 5000-89-1838, dated 11/16/89

On January 10, 1990, GPU Nuclear (GPUN), and NRR discussed the 13R inspection criteria for the Reactor Water Cleanup System (RWCU) welds outboard of the second containment isolation valve. Briefly, our plan (Ref. 3) was to perform during the hydro test a visual check of the welds outboard of the second valve and to ultrasonically (UT) examine these welds only in the event of IGSCC being detected in the more susceptible welds inboard of the second valve. The Staff agreed with our man-rem concerns for the inspections, but did not concur with the inspection plan as proposed. The Staff requested that GPUN review the fabrication records to determine whether the welds between the first and second valves, were radiographed during construction. If these welds were fabricated to the same criteria as the outboard welds, then GPUN could classify these welds as representative of the IGSCC susceptible welds outboard of the second valve. UT of these welds between the valves, with an additional 10 welds outboard of the second valve, would provide a representative sample for the 13R IGSCC inspections.

In response to the staff request, GPUN has reviewed the piping specification for the RWCU system, and has determined that all welds required 100% radiography. Further, the piping and welds inboard of the first isolation valve were fabricated to ASME Section I, 1965 edition, and the piping and welds beyond the first valve were fabricated to ASA B31.1, 1955 edition.

Based on these facts, our original proposal (Ref.3) has technical merit. The RWCU welds within the IGSCC boundary are differentiated by their operational stresses. For example, those welds residing inboard of the second valve have a higher propensity for IGSCC than those outboard of the second valve, because the operational stresses are higher by a factor of two.

9003010472 900221
PDR ADDCK 05000219
PDC

RWCU

However, in response to the Staff's generic concern for RWCW welds outside of the second valve, GPUN has opted to include 10 (approximately 10%) of the welds outboard of the second valve in the initial 13R UT inspection sample. If indications are characterized as IGSCC in this inspection sample, GPUN will approach the staff on their disposition and any plans for sample expansion.

If no indications of IGSCC are found outside of the second isolation valve during 13R, there would be additional technical justification for our original plan (Ref. 3). We would then reinstate this inspection plan after the 13R outage. Therefore for post 13R required RWCW weld inspections, a visual check would be performed during the hydro test of the welds outboard of the second isolation valve. UT examinations would be performed for those welds only in the event of IGSCC being detected in the more susceptible welds inboard of the second valve. For the IGSCC detected within the welds inboard of the second isolation valve during examination of the initial inboard sample, a maximum of 10 percent of the welds outboard of the second valve that reside within the IGSCC boundary would be examined.

This letter supercedes our previous inspection plan (Ref 3) for the RWCW welds outboard of the second isolation valve. In order to preserve the OCNCS IGSCC inspection plan within one source document, GPUN will submit a revision to our previous GL88-01 response. This document will include this change to our RWCW inspection plan and outline the revised piping replacement plans for the 13R outage. If you have any questions, please contact Mr. Michael Laggart, Manager, BWR Licensing, at (201) 316-7986.

Very truly yours,

J. Capodanno for
J. C. DeVine, Jr.
Director Technical Functions

JCD/DGJ/cjg

cc: Mr. William T. Russell, Administrator
Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

NRC Resident Inspector
Oyster Creek Nuclear Generating Station
Forked River, N.J. 08731

Mr. Alex Dromerick
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, D.C. 20555

RWCW