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October 25, 1990
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United States Nuclear Regulatory Commission
Attention: Document Control Desk
Mailing Station PL-137
Washington, D.C. 20555

Gentlemen:

SUBJECT: Oyster Creek Nuclear Generating Station
Docket Number 50-219 License DPR-16
Generic Letter 88-01
Weld Overlay Procedure Development for Water-Backed
Nozzle-To-Safe-End Welds

EPRI and other industry organizations have initiated work to develop repair methods for nozzle-to-safe-end welds containing Inconel 182 filler metal. Oyster Creek is constructed with safe-ends employing this type of weldment.

During the 13R refueling outage, GPU Nuclear will be performing ultrasonic examinations on four (4) welds of this type. Since the potential for finding indications of IGSCC in these weldments exists, GPUN is preparing for this contingency.

GPUN has contracted Nutech engineers to develop a water-backed method to perform weld overlay repairs to this type of joint. GPUN has anticipated this need for the following reasons:

1. Inconel 182 is an IGSCC susceptible material.
2. Inlet recirculation safe-ends to be examined in the future have very tight restrictions with respect to the bio-shield openings. Because of this restriction, methods of preheat and post weld heat treatment, involving heating coils and blankets would be very difficult to employ in using ASME Code Case 432.

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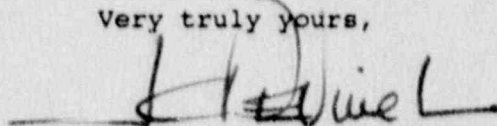
3. Because it is unknown when a prospective repair might be required during the outage, plant condition requirements to invoke Code Case 432 could require an additional core off-load and reactor vessel draindown. Both of these evolutions are major changes in plant conditions with an attendant increase in personnel radiation exposure in performing drywell outage work.

The attached report describes the technical issues concerned with the contingency repair process GPUR believes may be utilized for weld repair during the upcoming outage. The process of submitting it to ASME for review has begun. Because GPUN senses a strong need to have this contingency plan available for 13R, we request that the staff review the subject method. Formal approval will be requested when GPUN decides that repairs using this process will be required during the 13R outage.

The 13R outage is currently scheduled to begin in February 1991.

In the event comments or questions relative to the review arise, please contact Mr. M. Laggart, Manager Corporate Licensing, at 201-316-7968.

Very truly yours,



J. C. DeVine, Jr.
Vice President and Director
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