

GPU Nuclear

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Writer's Direct Dial Number:

Feb 4, 1983

Mr. Frank J. Miraglia
Assistant Director for Safety Assessment
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

SUBJECT: Oyster Creek Nuclear Generating Station
Docket 50-219
Generic Letter 81-04, Implementation
of NUREG 0313, Revision 1

This is in response to your letter of November 23, 1982 in which you expressed concern regarding the recent discoveries of intergranular stress corrosion cracking (IGSCC) at several operating nuclear power plants.

Our letter dated December 1, 1982, in response to I & E Bulletin 82-03 described the proposed sample size and basis for sampling selection to be taken during the upcoming outage. In addition, material characteristics and ultrasonic inspection methods were discussed. Because of the requirements to notify you of inspection findings and resulting repairs prior to resuming power operation, we plan on answering your present request in more detail at some time during the upcoming outage.

GPU Nuclear is investigating potential solutions for any contingencies. Among these are failure analysis/fracture mechanics, backlay weld repairs, Induction Heating Stress Improvement (IHSI), Post Weld Heat Treatment (PWHT), partial replacement of loop piping, and complete replacement of individual loop piping.

GPU Nuclear (GPUN) shares the NRC's concern for the potential of pipe cracks remaining undiscovered in large diameter BWR piping. We consider this issue to be of significance with regard to plant reliability. However, based on the work conducted by the BWR pipe cracking owner's group and General Electric Company in establishing the "leak-before-break" argument, GPUN does not consider this to be an immediate safety concern. We are convinced that your questions regarding augmented inservice inspection, replacement of non-conforming material, and general implementation of NUREG 0313 will be much more accurately answered following the planned inservice inspection and the thorough consideration of results, which will follow. Our present intentions with regard to leak detection systems are outlined in the Systematic Evaluation Program (SEP) integrated assessment for Oyster Creek and involves topics III-5.A "Effects of Pipe Breaks on Structures Systems and Components Inside Containment" and III-5.B "Pipe Breaks Outside Containment".

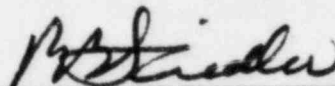
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At this time we wish to amend our June 30, 1981 letter with regard to recirculation system nozzle safe ends. In that letter it was stated that the safe ends had been removed and replaced with safe ends of Inconel 600 prior to beginning commercial operation. It is true that a large scale modification was undertaken as a result of safe end cracking. However, the remedy consisted of applying a 308 stainless steel weld clad to the inner and outer surfaces of the existing sensitized safe ends. This is an acceptable crack remedy per NUREG 0313.

In the event that any comments or questions arise, please contact Mr. J. Knubel at (201) 299-2264.



P.B. Fiedler
Vice President and Director
Oyster Creek

PBF:jal

cc: Ronald C. Haynes, Administrator
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NRC Resident Inspector
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