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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

December 21, 1982

U. S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

ATTENTION: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit No. 2; Docket No. 50-318
Inservice Inspection Program Request For Relief from ASME Code
Section XI Requirements Determined to be Impractical

REFERENCES: a) BG&E Letter dated November 19, 1980 from Mr. A. E. Lundvall,
Jr. to Mr. Robert W. Reid
b) BG&E Letter dated August 30, 1982 from Mr. A. E. Lundvall, Jr. to
Mr. Robert A. Clark

Gentlemen:

References a) and b) transmitted a request for exemption from ASME Code, Section XI hydrostatic pressure testing requirements for certain repairs and modifications made to portions of safety related systems at Calvert Cliffs. Reference a) addressed portions of the main steam and feedwater systems for pipe sizes 5" and smaller. Reference b) addressed portions of pipe associated with the main steam supply to the Auxiliary Feedwater System upstream of 2-CV-4070 and 2-CV-4071. Justification for the above was based on precluding additional hydrostatic pressure cycles on the Steam Generator Vessels and is explained in detail in the above references.

Reference a) transmitted an exemption request for all welds associated with 5 inch and under portions of steam and feedwater systems that cannot be isolated from the steam generators. As a result of modifications associated with the Third Train Auxiliary Feedwater System, a total of ten welds were performed on the two tie-ins of the new four inch Auxiliary Feed Pump Discharge piping to the existing Auxiliary Feed lines to 21 and 22 Steam Generators. These ten welds are not isolable from the secondary side of the Steam Generators. It has been determined that hydrostatic pressure testing of these welds prior to returning the system to operation is impractical. The locations of the welds are shown on Attachment 1 details A & B.

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We have determined that Reference b) does not adequately identify all welds associated with the request for exemption. As stated in reference b) it was necessary to replace the two motor operated valves in the steam supply piping to the existing Auxiliary Feedwater pumps with control valves. Reference b) stated, only the two upstream pipe to valve welds of this modification would require relief from hydrostatic pressure test requirements. Notwithstanding, a spool piece from the existing pipe to the new control valves will also require exemption. Therefore, two welds upstream of each control valve will require relief from the hydrostatic pressure testing requirements of Section XI. The additional welds were necessitated by construction constraints which we were not aware of at the time we prepared our submittal. References a) and b) described the following non-destructive tests to be performed in lieu of the ASME Code hydrostatic test:

1. Surface examination after removing half the first weld layer by grinding.
2. Surface Examination after the final weld pass.
3. An Inservice Examination of the components at a pressure corresponding to 100% reactor power. An Inservice Examination of the components in the HOT STANDBY mode (which is approximately 50 psi greater than 100% normal operating pressure).
4. A 100% Volumetric Examination on butt welds greater than one (1) inch nominal pipe size utilizing ultrasonic and/or radiography methods.

The above listed NDE requirements contained within these exemption requests were not formally transmitted within Baltimore Gas and Electric Company. As a result personnel preparing field work packages used normal construction methods followed by volumetric examinations. Because normal construction methods were used the commitment to perform a surface examination after removal of half the first weld layer by grinding was inadvertently omitted from the construction NDE requirements.

The field work was completed in accordance with USAS B31.7, Chapter 2-VI, Examination and Test, which does not require a surface exam after removal of half the first weld layer. Although a surface exam after removal of half the first weld layer was not completed, a visual examination was performed after the fitup, root pass, and final weld pass of the fourteen welds in question. The remainder of the Non-Destructive Exams proposed in References a) and b) have been completed except the examination of the components under pressure. This examination will be performed during plant startup. The visual examination of the weld root pass combined with the visual, surface and volumetric exams of the final weld along with pressure testing, in lieu of ASME Section XI requirements, insure the integrity of the welds.

The fourteen welds above are requested for exemption from the hydrostatic testing requirements of ASME Section XI prior to being placed in service. This request does not obviate testing that will be performed during the ten year interval requirement for hydrostatic pressure testing of this system. Hydrostatic pressure testing of these welds will be performed during the steam generator hydrostatic pressure test scheduled to be performed during the third forty-month period of the Inspection Interval which begins December 1, 1983.

Mr. R. A. Clark
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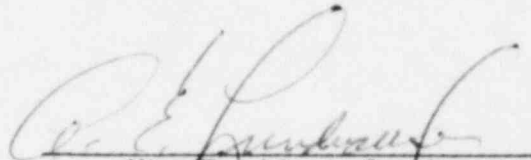
Normally, additional instructions over and above the requirements specified in applicable Codes and Standards are transmitted in the form of special instructions associated with the engineering package describing modifications to safety related structures. This mechanism was not effective in calling to the attention of individuals responsible for preparing the field work package, the commitments made in Reference a) and b). This inadequacy in administrative controls has been brought to the attention of individuals responsible for preparation of work packages and supervision of plant modifications.

Corrective actions to prevent similar occurrences of this nature are being considered by the Plant Management and will be described in a followup letter.

We have determined that this request constitutes a Class III amendment pursuant to 10 CFR 170.22, and accordingly, Baltimore Gas and Electric Company check no. A110653 in the amount of \$4,000.00 is remitted herewith.

Should you have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,



Vice President - Supply

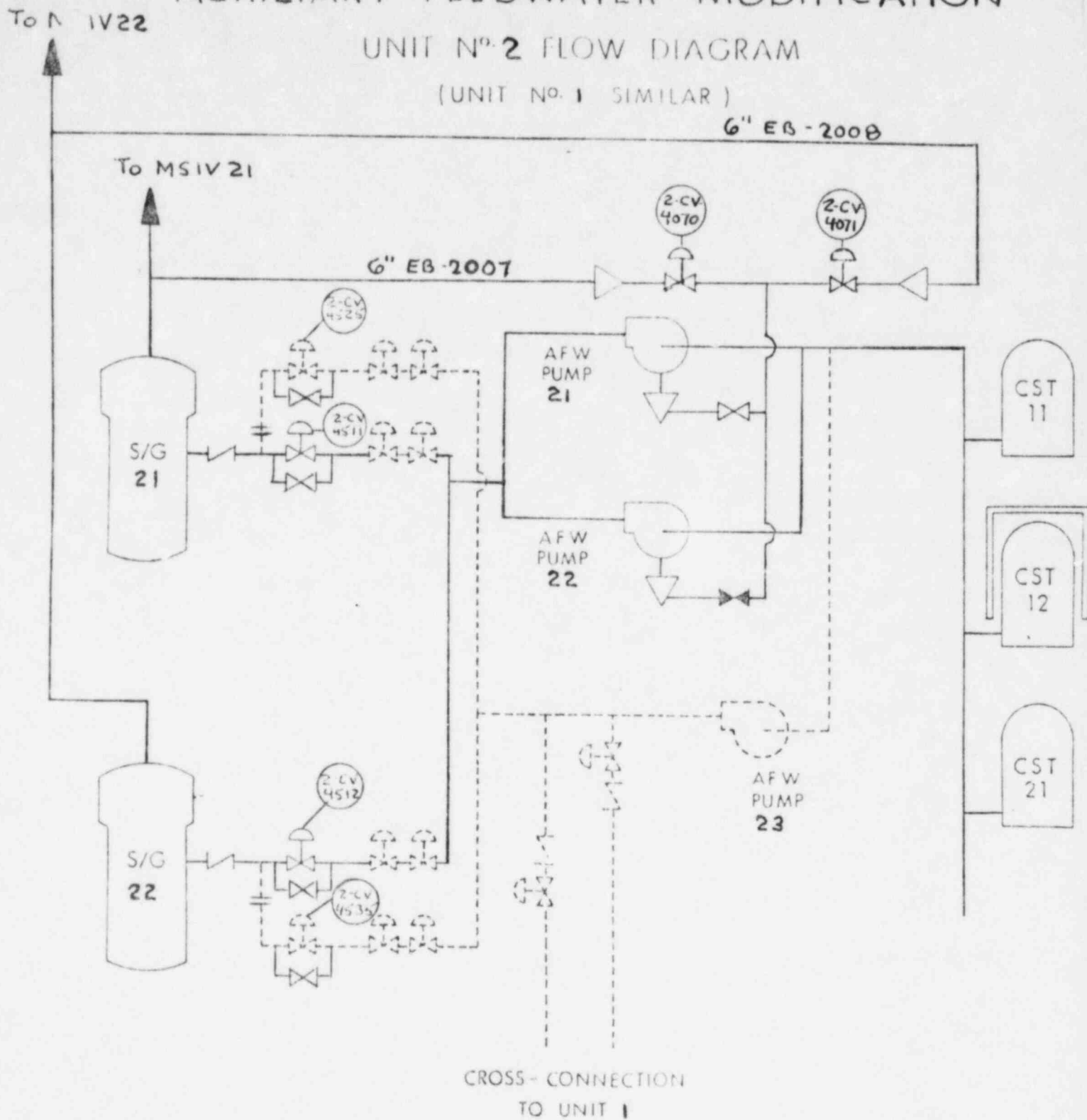
AEL/LOW/sjb

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
D. H. Jaffe, NRC
R. E. Architzel, NRC

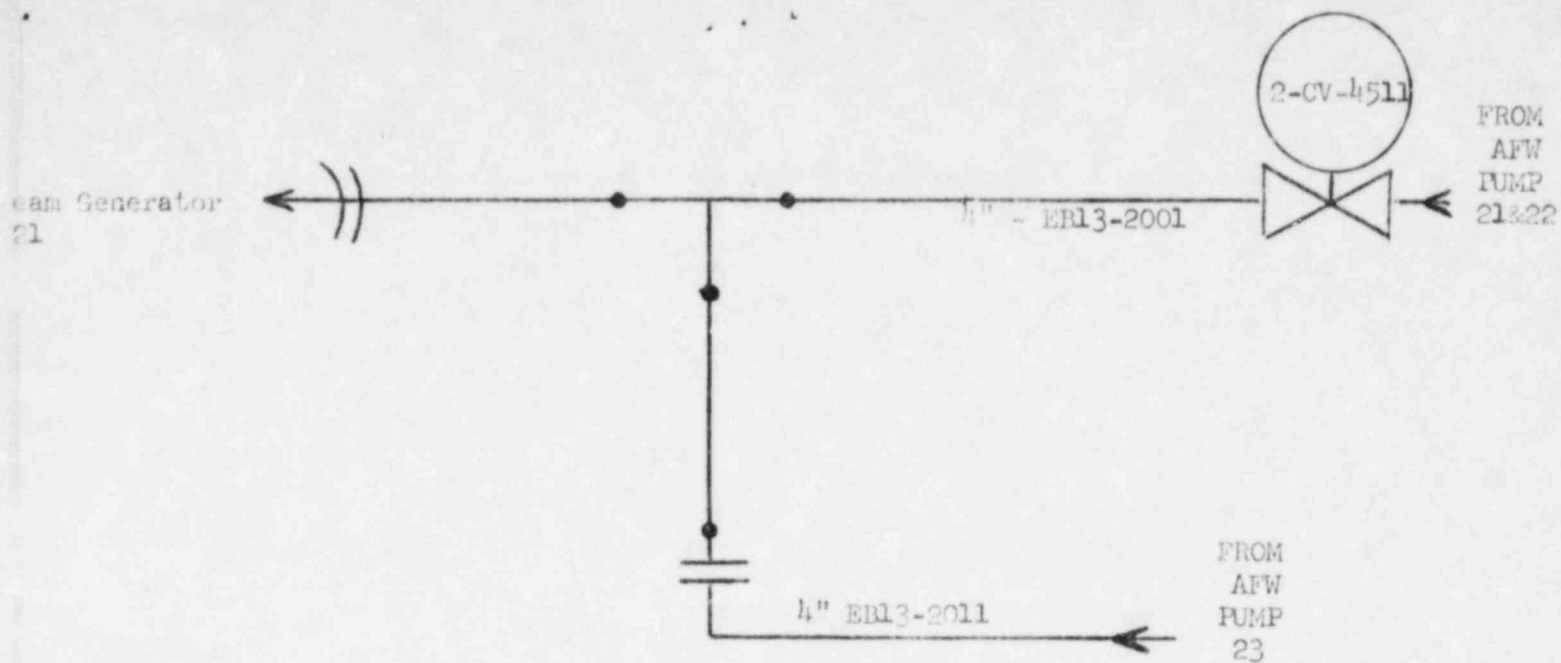
AUXILIARY FEEDWATER MODIFICATION

UNIT No. 2 FLOW DIAGRAM

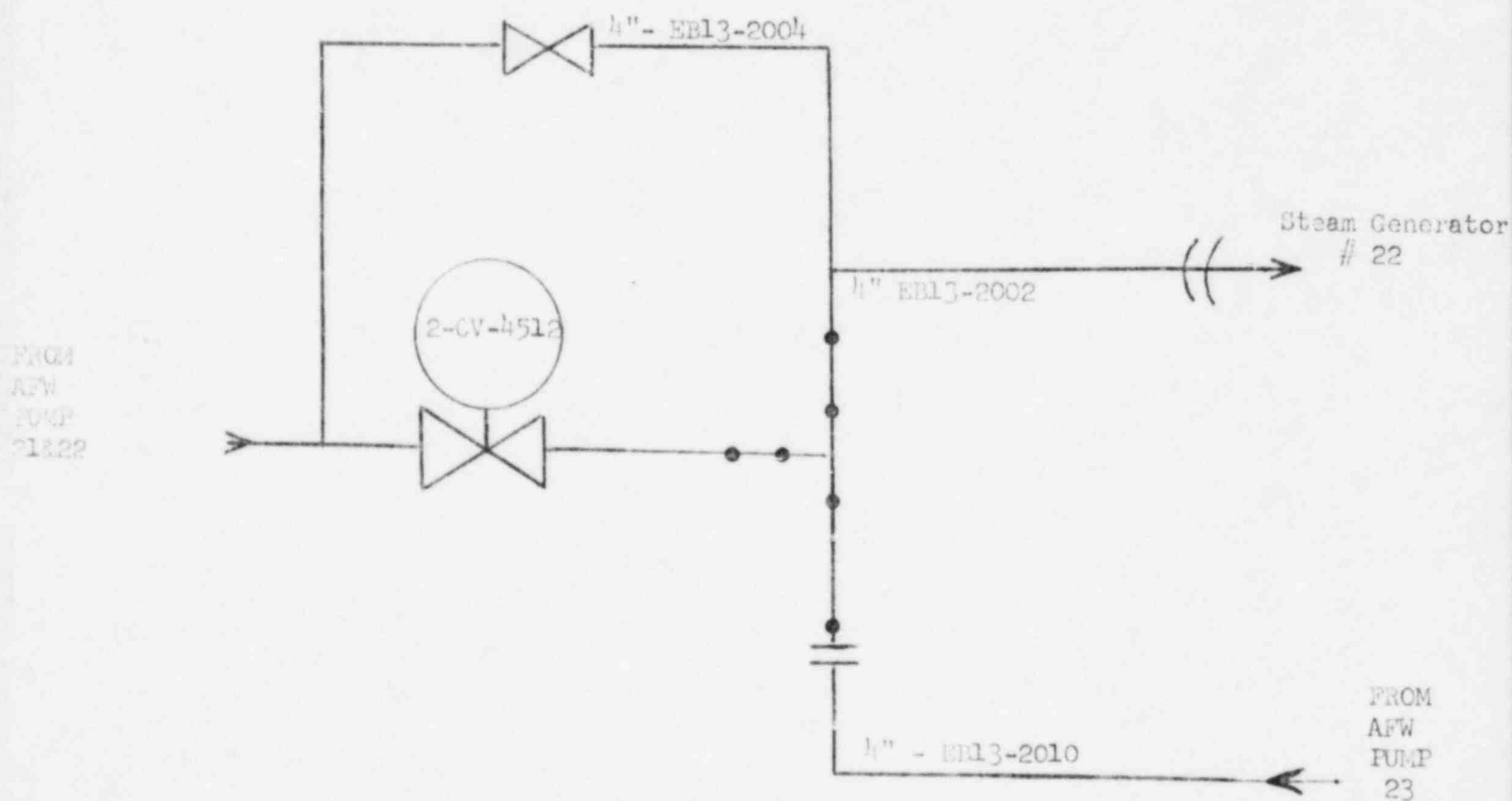
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Attachment 1



DETAIL A



DETAIL B