



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

March 16, 1983

Mr. James G. Keppler, Regional Administrator
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Byron Station Units 1 and 2
Final Response to Inspection Report
Nos. 50-454/82-01 and 50-455/82-01
NRC Docket Nos. 50-454 and 50-455

- References (a): C. E. Norelius letter to Cordell Reed
dated January 27, 1982.
- (b): E. E. Potter letter to K. Ward dated
January 27, 1982.
- (c): L. O. DelGeorge letter to J. G. Keppler
dated February 26, 1982.
- (d): M. E. Sheehan letter to E. E. Potter
dated June 7, 1982.
- (e): P. D. Stumpf letter to E. E. Potter
dated March 1, 1983.

Dear Mr. Keppler:

This letter is the final response to the inspection conducted by Mr. K. D. Ward on January 12 and 14, 1982, of activities at Byron Station. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements. Specifically, the item of non-compliance alleged that Non-Destructive Examination (radiographic) techniques utilized by Southwest Fabricating and Welding Company were not performed in accordance with ASME Section V Code requirements.

As explained in References (b) and (c), it is Commonwealth Edison Company's judgment that we are not in violation of the intent of the Code as it applies to the placement and numbers of penetrameters utilized by Southwest. In order to resolve the divergent interpretations of the Code words, Commonwealth Edison Company submitted a Code Inquiry to Subcommittee V of the ASME Boiler and Pressure Vessel Code on February 2, 1982.

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References (d) and (e) provide the ASME responses to our Code inquiry. These interpretations, which are enclosed for your review, support the practices which were utilized are in accordance with the intent of the Code.

Therefore, it is respectfully requested that this item of non-compliance be rescinded.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

CW Schroeder
for D. L. Farrar 3/15/83
Director of Nuclear Licensing

CWS/lm

Attachment

cc: NRC Resident Inspector - Byron

6203N



The American Society of Mechanical Engineers

United Engineering Center • 345 E. 47th St. New York, N.Y. 10017 • 212-644-7722 • TWX-710-581-5267

June 7, 1982

Mr. E.E. Potter
Commonwealth Edison
1319 South First Avenue
Maywood, IL 60153

SUBJECT: Interpretation of Section V, Article 2,
Para. T-262.3 (a) and (b)

ITEM: BC-82-113

REFERENCE: Your letter dated February 2, 1982

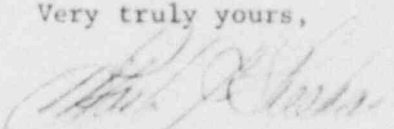
Dear Mr. Potter:

Our understanding of the question in your inquiry, and our reply, are as follows:

Question: Is it permissible to use more than one penetrometer in accordance with Section V, Article 2, Par. T-262.3 (a), 1974 Ed., 1975 Summer Addenda?

Reply: Yes, Par. T-262.3 (a) does not prohibit more than one penetrometer.

Very truly yours,


Mark E. Sheehan
Assistant Secretary, Boiler
and Pressure Vessel Committee
(212) 705-7819

/cmn

ASME procedures provide for reconsideration of this interpretation when or if additional information is available which the inquirer believes might affect the interpretation. Further, persons aggrieved by this interpretation may appeal to the cognizant ASME committee or subcommittee. As stated in the foreword of the code documents, ASME does not "approve," "certify," "ata," or "endorse" any item, construction, proprietary device or activity.



The American Society of Mechanical Engineers

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March 1, 1983

Mr. E. Potter
Commonwealth Edison Co.
Maywood Technical Center
1319 South First Avenue
Maywood, IL 60153

Subject: Section V; Code Case 1914 for Alternate Penetration
Placement

Item: BC82-113

Reference: Your letter of February 2, 1982

Dear Mr. Potter:

The Committee at its meeting of September 17, 1982 approved a
proposed Code Case which will be of interest to you.

The Case is attached for your information.

The Code Case, as approved by Council, will become effective as of
February 7, 1983.

Very truly yours,

Paul D. Stumpf

Paul D. Stumpf
Assistant Secretary/Boiler
and Pressure Vessel Committee
(212) 705-7096

PDS/ky

Code Case 1914 for Alternative Penetrameter Placement, Section V

Inquiry:

Is it permissible to place penetrameters on the weld in lieu of, or in addition to, the penetrameters placed adjacent to the weld, as required by T-263.1(a) of Section V?

Reply:

It is the opinion of the Committee that, for Section V applications, the penetrameter placement described in the Inquiry is permitted, provided the penetrameter identifying numbers and skim(s) (if used) are not placed on the weld metal.