

DOCKET NUMBER PR 50
PROPOSED RULE (56 FR 03796)

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Pennsylvania Power & Light Company

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Harold W. Keiser
Senior Vice President-Nuclear
215/774-4194

APR 8 1991

Mr. Samuel J. Chilk
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Docketing and Service Branch

SUSQUEHANNA STEAM ELECTRIC STATION
COMMENTS ON PROPOSED RULE - REVISION TO
10 CFR 50.55A
PLA-3568 FILES R41-2, A17-11

Docket Nos. 50-387
and 50-388

Dear Mr. Chilk:

Pennsylvania Power & Light Company (PP&L) is submitting comments in response to the proposed rule incorporating the 1986 Addenda, 1987 Addenda, 1988 Addenda and 1989 Editions of ASME Boiler and Pressure Vessel Code, Section III, Division 1 and Section XI, Division 1, by reference into 10CFR50.55a (55 Federal Register 53220 - December 27, 1990).

PP&L supports the addition of later addenda and editions of the ASME Boiler and Pressure Vessel Code, Sections III and XI to 10CFR50.55a. However, we would request that the Commission consider the following:

A clearer definition of "essentially 100%" would help licensees assess RPV shell weld examination limitations so inspection alternatives could be evaluated. If based on the total length of RPV shell welds approximately 90% examination coverage for all the RPV shell welds would be accomplished, it is not clear that this 90% examination coverage would be acceptable in accordance with the proposed revision. For example, two longitudinal shell welds having only 22% examination coverage from the outside of the vessel, but could be 100% examined from the inside of the vessel may not be acceptable under the

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proposed rule change even though the overall examination coverage is 90% based on the total length of all RPV shell welds, and would be "essentially 100%". A clearer understanding of what is meant by "essentially 100%" is needed.

Very truly yours,



H. W. Keiser

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. J. J. Raleigh, NRC Project Manager