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MURRAY R. EDELMAN

VICE PRESIDENT
NUCLEAR

June 4, 1985

PY-CEI/NRR-0265 L

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
PNPP Use of ASME Code Case N-393
"Repair Welding Structural Steel
Rolled Shapes and Plates for
Component Supports"

Dear Mr. Youngblood:

The purpose of this letter is to notify and to request NRC approval of the use and implementation of Code Case N-393 at Perry Nuclear Power Plant. This is being done in accordance with the provisions of Regulatory Guide 1.84 and 10CFR50.55(a)(3) which address the requirements for use of a code case not yet adopted by the Commission via Regulatory Guide 1.84 revision.

Recently it has been identified that some carbon steel structural steel rolled shapes and plates used for fabrication of piping supports were repair welded utilizing the Gas Tungsten Arc Welding (GTAW) process. The material specification, SA-6, governing repair welding requirements for carbon steel does not permit use of a GTAW process. (Note: ASME Code Effective - 1974 Edition, Winter '75 Addenda). Our evaluation of the as-installed repair welds has determined that the welds were made using qualified welders, qualified procedures and that all other applicable requirements of Subsection NF were met. Therefore, all the requirements set forth by the code case have been met.

CEI has concluded that (i) the proposed code case application provides an acceptable level of quality and safety, and (ii) the increase in safety margin provided by referenced code requirements is not necessary to satisfy corresponding stress limits. Pending your approval appropriate changes will be incorporated in a future Perry FSAR amendment.

Please call if you have any questions.

Very truly yours,

Murray R. Edelman
Vice President
Nuclear Group

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MRE:njc

cc: Jay Silberg, Esq.
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Boo!
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