

October 22, 1985

DMB 016

Docket No. 50-278

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: PEACH BOTTOM ATOMIC POWER STATION, UNIT 3, PIPING INSPECTION
PROGRAM (GENERIC LETTER 84-11)

We have reviewed the submittals dated June 4 and October 5, 1984 from the Philadelphia Electric Company (PECO or the licensee) regarding the inspection program of reactor coolant stainless steel piping in response to Generic Letter 84-11 ("Inspections of BWR Stainless Steel Piping," April 19, 1984). PECO indicated that during the 1985 Unit 3 refueling outage, a total of 31 welds, including six overlay repaired welds would be inspected by qualified ultrasonic examiners. PECO also indicated that it planned to continue the use of the moisture detection system as an additional surveillance measure to detect small primary system leakage. Based on our review of the licensee's submittals, we conclude that the licensee's inspection plan for the 1985 refueling outage meets the guidelines of Generic Letter 84-11 with the exception of the proposed sample expansion logic when cracks were found. PECO proposed to expand the samples only for the size of pipe where cracks were found, where as the sample expansion scheme recommended in IE Bulletin 83-02 required doubling of the original sample sizes, irrespective of pipe sizes.

Currently, the pipe inspection program is underway at Peach Bottom Unit 3. As a result of finding cracks in a number of pipe welds, PECO has expanded the sample size to a total of 132 welds, which includes essentially all inspectable welds that were considered to be susceptible to intergranular stress corrosion cracking. Therefore, the sampling requirements of Generic Letter 84-11 have now been met.

We, therefore, conclude that the licensee's actions as they pertain to the inspection guidance of Generic Letter 84-11 are acceptable and conclude that no further action is required under the inspection portion of Generic Letter 84-11.

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Mr. Edward G. Bauer, Jr.,

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The staff, however, has met with the licensee on September 5, September 17 and October 1, 1985, to discuss the licensee's proposed mitigative actions involving the recently discovered cracked welds at Unit 3. NRC staff review of these mitigative actions is being conducted in accordance with Generic Letter 84-11 guidance on mitigation and will be the subject of pending NRC action.

Sincerely,

*ORIGINAL SIGNED BY
JOHN F. STOLZ*

John F. Stolz, Chief
Operating Reactors Branch #4
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