



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 17, 1999

Carl Terry, BWRVIP Chairman  
Niagara Mohawk Power Company  
Post Office Box 63  
Lycorning, NY 13093

SUBJECT: DEFERMENT OF INSPECTIONS FOR WELD OVERLAYS AS REQUIRED BY  
GENERIC LETTER 88-01 (TAC NO. MA5012)

Dear Mr. Terry,

By letter dated May 13, 1999, you requested that the NRC staff "...allow the BWR plants identified below to defer weld overlay examinations until March 2001, or until the completion of the NRC staff review and approval of the proposed generic report, whichever comes first." Presently, under the requirements of Generic Letter (GL) 88-01, "NRC Position on IGSCC In BWR Austenitic Stainless Steel Piping," dated January 25, 1988, and NUREG-0313, Rev. 2, "Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping," dated January 1988, which details the technical bases for the positions presented in GL 88-01, licensees shall have an in-service inspection (ISI) program for austenitic stainless steel piping covered under the scope of GL 88-01 that conforms to the staff positions on inspection schedules, methods and personnel, and sample expansion delineated in GL 88-01.

The plants which are scheduled for fall 1999 outages include Dresden Unit 2, Duane Arnold, and Vermont Yankee. Other plants for which this deferral would be applicable would include Brunswick Units 1 and 2, FitzPatrick, Hatch Unit 1, Hope Creek, Peach Bottom Unit 2, and Quad Cities Units 1 and 2. The criteria you proposed that must be met for this deferral include:

1. The plant is operated in compliance with the EPRI water chemistry guidelines,
2. The overlay for which deferral is applied meets GL 88-01 or ASME Code Case N-504 (full structural overlay) as opposed to a temporary duty (leakage barrier) overlay, and
3. The overlays for which the deferral is applied must have been inspected at least two (2) times without IGSCC indications in the overlay. The two examinations include a baseline examination after overlay application and one examination that was completed after the overlay has been in service for at least one full fuel cycle.

The NRC staff has reviewed this criteria, and finds them acceptable justification for deferral of weld overlay inspections, as required by GL 88-01 and NUREG-0313, Rev. 2 for the subject BWR plants. However, if any of the subject BWR licensees have a requirement for inspections of the subject weld overlays in their respective Technical Specifications (TS), the licensee will be required to formally request a TS change allowing this deferral.

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C. Terry

The NRC requests that each licensee desiring to defer inspections of the subject weld overlays inform the staff prior to 30 days to the start of the outage, that the licensee meets the above criteria, enumerate which weld overlays will not be inspected, and either confirm that the respective inspection history cited in the BWR Owners' Group BWROG-99024 letter, "BWR Owners Group Program on Weld Overlay Inspection Relief, BWR Project Number 691," dated March 5, 1999, is accurate and current or update the information to the most current available. Each responding licensee should reference this letter.

Please contact C. E. (Gene) Carpenter, Jr., of my staff at (301) 415-2169 if you have any further questions regarding this subject.

Sincerely,

Jack R. Strosnider, Director  
Division of Engineering  
Office of Nuclear Reactor Regulation

cc: See next page

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Duane Arnold PM  
Vermont Yankee PM  
Brunswick Units 1 and 2 PM  
FitzPatrick PM  
Hatch Unit 1 PM  
Hope Creek PM  
Peach Bottom Unit 2 PM  
Quad Cities Units 1 and 2 PM

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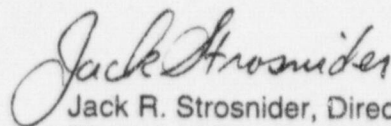
C. Terry

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