



March 31, 2000

PSLTR #00-0066

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Revision to Information Previously Submitted Regarding SEP Topic III-1,
"Quality Group Classification of Components and Systems"

- Reference:
- 1.) Letter from Byron Siegel (US NRC) to Henry E. Bliss (ComEd),
"IPSAR Topic III-1, Classification of Structures, Systems and
Components, Radiography Requirements (TAC 65175)," dated
June 28, 1988
 - 2.) Letter from Thomas J. Rausch (ComEd) to Paul O'Conner (US NRC),
"Dresden 2 SEP Topic: III-1, Quality Group Classification of
Components and Systems," dated July 16, 1982

The purpose of this letter is to notify the NRC of information that is different than originally identified by the Commonwealth Edison Company (ComEd) Dresden Nuclear Power Station (DNPS) in response to SEP Topic III-1, "Quality Group Classification of Components and Systems." This information was utilized, in part, by the NRC during their review and issuance of the SER identified in Reference 1. An attachment to Reference 2 was provided to answer questions associated with fracture toughness requirements for materials in various systems.

This attachment, "Table 5-1 Review of Fracture Toughness Requirements – Dresden Nuclear Power Plant Unit 2," indicated that the service water piping, fittings, and valves for the Standby Diesel Generator System and the Containment Coolant Subsystem were constructed of ASTM A106, Grade B carbon steel material. Additionally, based on other requirements (e.g. the nominal thickness of the material was 5/8 of an inch or less in thickness), no impact test was required.

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Subsequent to this submittal we discovered on November 17, 1999, that both the diesel-generator cooling water (DGCW) and containment cooling service water (CCSW) systems were designed and fabricated with cast iron materials. A review of design information revealed that the DGCW System has valve bodies of size 2-1/2 inches or larger made of cast iron material. Also, the CCSW System has cast iron valves at the suction of each CCSW pump and the pump casings are also cast iron. This was a concern regarding the original SER because there are no material specifications for cast iron that are acceptable for ASME Section III, Class 3 components. Upon the discovery of this issue, we initiated Problem Identification Form (PIF) number D1999-04778 to document the item and capture it within our corrective action program. Also, this condition was evaluated and documented in Operability Evaluation 99-043 that determined the systems to be operable.

The engineering review performed regarding this issue identifies that the material is acceptable in USAS B31.1-1967 and is allowed by the original Code of Construction in limited applications. The attached report, "Acceptance Criteria for the Use of Cast Iron Components in the CCSW and DGCW Systems, Dresden Nuclear Power Station" Revision 1, contains the proposed criteria to accept continued use of cast iron in the CCSW and DGCW systems.

Should you have any questions concerning this letter, please contact Mr. Dale Ambler at (815) 942-2920 extension 3800.

Respectfully,

 Preston Swafford
Robert Brown (RM)

Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Attachment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station