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10CFR 50.55a(a)(3)(i)



June 30, 2000

PSLTR: 00-0100

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

Dresden Nuclear Power Station, Unit 2  
Facility Operating License Nos. DPR-19  
NRC Docket No. 50-237

Subject: Temporary Relief Request for Alternative Requirements for Snubber  
Visual Inspection Intervals and Corrective Actions

Reference: NRC Generic Letter 90-09, "Alternative Requirements for Snubber Visual  
Inspection Intervals and Corrective Actions," dated December 11, 1990.

The purpose of this letter is to document the results of a telephone conference between members of the Nuclear Regulatory Commission (NRC) and Commonwealth Edison (ComEd) Company regarding temporary relief for Dresden Nuclear Power Station (DNPS) Unit 2 from the inservice inspection requirements of 10 CFR 50.55a(g) "Inservice Inspection Requirements," to allow the use of alternative requirements for snubber visual inspection intervals and corrective actions. Inspections of these snubbers is required by paragraphs IWF-5200(a) and IWF-5300(a) of the first addenda to American Society of Mechanical Engineers / American National Standards Institute (ASME/ANSI) Operations and Maintenance (OM) 1987 Edition, Part 4, published in 1988. (OMa-1988 Part 4, per 10CFR50.55a, "Codes and Standards," paragraph (b)(2)(viii), published August 6, 1992).

ComEd requested temporary approval of this alternative proposal for visual examination of all safety related hydraulic and mechanical snubbers as described in the attached relief request.

This temporary relief request was discussed with members of the NRC in a telephone conversation on June 30, 2000. Based on this discussion, we understand that verbal approval has been granted with the submittal of this letter. A permanent relief request for DNPS Units 2 and 3 will be submitted separately.

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

Respectfully,



Preston Swafford  
Site Vice President  
Dresden Nuclear Power Station

Attachment

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

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**ISI Program Plan**  
**Dresden Station Units 2 & 3, Third Interval**

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**TEMPORARY RELIEF REQUEST**

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**COMPONENT IDENTIFICATION**

Code Class: 1, 2, 3  
Reference: IWF-5200(a), IWF-5300(a)  
Examination Category: Not Applicable  
Item Numbers: Not Applicable  
Description: ISI Snubbers Included In The Technical Specification  
Snubber Visual Examination Program

**CODE REQUIREMENTS**

Preservice examination required by paragraph IWF-5200(a) and Inservice examination required by paragraph IWF-5300(a) in accordance with the first addenda to American Society of Mechanical Engineers / American National Standards Institute (ASME/ANSI) OM-1987 Edition, Part 4, published in 1988 (OMa-1988, Part 4, per 10 CFR 50.55a, paragraph (b)(2)(viii), published August 6, 1992).

**BASIS FOR RELIEF**

The current Dresden Nuclear Power Station (DNPS) Technical Specifications (TS) include a comprehensive program for visual examination of all safety related snubbers. The safety related snubber population encompasses all ASME Code Class 1, 2, and 3 snubbers.

There are approximately 192 safety related snubbers on DNPS Units 2 and 3. The overlap of the visual examination program required by ASME and the TS for the Code Class snubbers presents an unnecessary redundancy without a compensating increase in the level of quality and safety.

The TS snubber visual examination program requires a sample size of 100% of all safety related snubbers and incorporates the alternate snubber visual examination delineated in USNRC Generic Letter (GL) 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions." As determined by the NRC, the alternate schedule of GL 90-09 maintains the same confidence level of quality and safety as the previous TS schedule, which was very similar in content to that of OMA-1988, Part 4.

The GL 90-09 alternate schedule is based on the number of unacceptable snubbers found during the previous examination in proportion to the sizes of the various snubber populations or categories.

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**ISI Program Plan**  
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**TEMPORARY RELIEF REQUEST**

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**BASIS FOR RELIEF** (Continued)

The alternative examination interval is based on a refueling cycle of up to 24 months and may be as long as two fuel cycles, depending on the number of unacceptable snubbers found during the previous visual examination.

Based on the reason that the TS snubber visual examination program maintains the same confidence level of quality and safety as that of OMa-1988, Part 4, DNPS requests that the TS visual examination program for snubbers be used in lieu of the OMa-1988, Part 4 visual examinations program required by ASME Section XI, Subarticles IWF-5200(a) and IWF-5300(a).

**PROPOSED ALTERNATE PROVISIONS**

DNPS will perform visual examinations of ASME Code Class snubbers in accordance with the snubber examination program contained in the latest approved revision of the TS (attached) in lieu of the OMa-1988, Part 4 visual examination program required by IWF-5200(a) and IWF-5300(a).

Visual examiners, who are qualified to the applicable rules of ASME Section XI Article IWA-2000, "Examination and Inspection," will perform the examinations of Code Class snubbers. Visual examination results of Code Class snubbers will be recorded and reported in accordance with the applicable rules of ASME Section XI Article IWA-6000.

**APPLICABLE TIME PERIOD**

Relief is requested for DNPS Unit 2, until a formal relief request has been submitted and approved for the Inservice Inspection Program for DNPS Units 2 and 3.