

Commonwealth Edison Company
Dresden Generating Station
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10CFR 50.55a(a)(3)(i)



June 30, 2000

PSLTR: 00-097

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

Reference: (1) NRC Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated December 11, 1990.

(2) Letter from P. Swafford (ComEd) to USNRC, "Temporary Relief Request for Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated June 30, 2000.

The purpose of this letter is to request permanent relief 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 at Dresden Nuclear Power Station (DNPS). 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).

Commonwealth Edison (ComEd) Company, in accordance with 10 CFR 50.55a(a)(3)(i) requests approval of this alternative proposal for visual examination of all safety related hydraulic and mechanical snubbers as described in the attached relief request.

In NRC Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," the NRC has indicated that an alternative inspection interval up to 48 months is acceptable dependent upon the number of unacceptable snubbers found during the previous visual inspection.

The basis for this alternative inspection is discussed in the attached relief request. Because DNPS's Technical Specifications (TS) require visual examination of all ASME

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Code Class 1, 2, and 3 safety related snubbers, safety related non-coded snubbers and non safety related snubbers whose failure could adversely affect a safety related system, the overlap of the inspections required by TS and ASME Section XI for the Code Class snubbers presents an unnecessary redundancy. Based on our review, we have concluded that the snubber visual examinations required by TS 3/4.8.F, "Snubbers," meet the intent of the program required by OMa-1988, Part 4. No plant safety benefits will be realized by imposing both programs on the Code Class snubbers at Dresden Station.

Temporary relief from this requirement for DNPS Unit 2 was granted as described in reference 2. We are requesting that permanent relief for DNPS Units 2 and 3 be granted as soon as possible.

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

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

RELIEF REQUEST NUMBER: CR-19

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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.

ISI Program Plan
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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 the third ten-year interval of the Inservice Inspection Program Dresden Station Units 2 and 3.

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Project Manager – NRR – Dresden Nuclear Power Station
Officer of Nuclear Facility Safety – IDNS
Senior Reactor Analyst – IDNS
Senior Vice President – Nuclear Operations - ComEd
Manager of Energy Practice – Winston and Strawn
Director, Licensing and Compliance – ComEd – Dresden Nuclear Power Station
Engineering Manager – Dresden Nuclear Power Station
Operations Manager – Dresden Nuclear Power Station
Regulatory Assurance Manager – Dresden Nuclear Power Station
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Dresden Regulatory Assurance, Subject File
SVP Numerical File – PSLTR #00-

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