

Commonwealth Edison Company
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450
Tel 815-942-2920

10 CFR 50 Appendix H



July 28, 2000

PSLTR-00-0110

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 Reactor Vessel Material Specimen Removal Schedule
- Reference:**
- (1) Letter From Jack R. Strosnider (NRC) to Carl Terry (BWRVIP Chairman), "BWR Integrated Surveillance Program (BWRVIP-78)", dated May 16, 2000
 - (2) Letter From Preston Swafford (ComEd) to USNRC "Request for an Amendment to Technical Specifications Section 3 /4.6.K, "Primary System Boundary" and Section 3 /4.12.C "Special Test Exceptions" and Request for Exemption from 10CFR 50.60, 'Acceptance criteria for fracture prevention measures for lightwater nuclear power reactors for normal operation,' " dated February 2, 2000

In accordance with 10 CFR 50 Appendix H, Section III, "Surveillance Program Criteria," paragraph B.3, we are requesting a change to the Dresden Nuclear Power Station (DNPS) Units 2 and 3 reactor pressure vessel (RPV) surveillance capsule withdrawal schedules. Currently the capsules are scheduled to be withdrawn from Unit 2 in the year 2000 and Unit 3 in the year 2001. We request deferral of the withdrawals for one additional fuel cycle to coincide with refueling outages in October, 2001, for Unit 2 and September, 2002, for Unit 3. As discussed in the paragraphs below, these proposed changes meet the applicable criteria described in Reference 1.

In response to 10 CFR 50 Appendix H, Section III.C, "Requirements for an Integrated Surveillance Program," the BWR Vessel and Internals Project (BWRVIP) recently developed a plan for an RPV integrated surveillance program (ISP). The BWRVIP ISP (i.e., BWRVIP-78) was submitted to the NRC on December 22, 1999. ComEd, as an active participant in the BWRVIP, intends to participate in the ISP as described in BWRVIP-78.

Based on criteria delineated in the BWRVIP-78 program plan (e.g. chemistry match, baseline data, and fabricator details), the DNPS Unit 3 capsules were selected as

A008

representative of several RPV's and were included in the proposed schedule for withdrawal, test, and analysis under the ISP. The DNPS Unit 2 capsules were not selected for withdrawal based on the current ISP.

The NRC, in Reference 1, endorsed the concept of a one-cycle capsule deferral to support the ISP and stated that deferral requests should address three criteria. Our review against those criteria are provided in the paragraphs below.

The deferral of removal of the RPV surveillance capsule from DNPS Unit 2 is consistent with BWRVIP-78, which does not call for removal of another capsule from this unit. DNPS Unit 3 is a target plant in BWRVIP-78, which states that DNPS Unit 3 will remove a capsule during the refueling outage scheduled for September 2000. At this outage DNPS Unit 3 will have accumulated 17.6 effective full power years (EFPY) of operation. Based upon discussions with Electric Power Research Institute and General Electric Nuclear Energy personnel responsible for the development of BWRVIP-78, it is our understanding that BWRVIP-78 will be modified to allow the DNPS capsules to accumulate additional neutron fluence before being removed. Therefore, we have concluded that the deferral of capsule removal for DNPS Unit 2 and 3 is consistent with the intent of the ISP.

The acquisition of material data in accordance with the current schedule is not required to ensure the integrity of the RPV through the period of the deferral. Currently, the Dresden Technical Specifications contain pressure-temperature (P-T) curves for up to 22 EFPY. In reference 2, we submitted a licensing amendment request revising our P-T curves and extending them to 32 EFPY. However, no capsule removals are required to support either the existing or proposed P-T curves. In addition, the data from the capsules would not be expected to provide Charpy shift values above 56°F for welds and 34°F for plates to be distinguishable from the scatter in the Charpy test method based on Regulatory Guide 1.99, Revision 2, equation (2).

As a result of deferring the capsule removals, the dosimetry information that is not obtained will not affect the validity of the RPV integrity assessments through the period of the deferral. The DNPS Units 2 and 3 RPV operating times are currently 17.8 EFPY and 17.2 EFPY, respectively. The maximum vessel operating times attained at the end of the proposed deferral period will be 19.35 EFPY for Unit 2 and 19.62 EFPY for Unit 3. These operating times represent a maximum of 89.2% of the current 22 EFPY boundary for the P-T limits. This provides margin to ensure that the current 22 EFPY fluence projection will not be exceeded during the deferral period. Also, the dosimetry information is not needed to support the proposed license amendment request mentioned above.

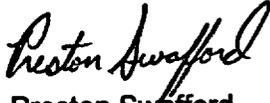
In summary, we believe the proposed one-cycle deferral of the RPV material surveillance capsule withdrawal is acceptable because it is consistent with the intent of the proposed BWR ISP, it will not delay data needed to support existing vessel evaluation requirements, and it will not affect the reactor vessel integrity assessment during the deferral period. Therefore we request deferral of the withdrawals for one additional fuel cycle to coincide with refueling outages in October, 2001, for Unit 2 and September, 2002, for Unit 3.

July 28, 2000
U.S. Nuclear Regulatory Commission
Page 3

We are requesting your review and concurrence by December 1, 2000.

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

Respectfully,



Preston Swafford
Site Vice President,
Dresden Nuclear Power Station

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety