

September 26, 2000

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: DRESDEN - AUTHORIZATION FOR PROPOSED ALTERNATIVE TO
SNUBBER VISUAL EXAMINATION PROGRAM (TAC NOS. MA9354, MA9375
AND MA9376)

Dear Mr. Kingsley:

By letter dated June 30, 2000, Commonwealth Edison Company (ComEd, the licensee) requested temporary relief to allow use of an alternative snubber visual examination program for the Dresden Nuclear Power Station, Unit 2. The Dresden Inservice Inspection (ISI) program is required to be performed in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, 1989 Edition, Articles IWF-5200(a) and IWF-5300(a), which reference the first addenda to the ASME/American National Standards Institute (ANSI) Operation and Maintenance (OM) Standard, 1987 Edition, Part 4, published in 1988 (OMa-1988, Part 4). ComEd proposed that the visual examination program for snubbers as required by Section 3/4.8.F of the Dresden, Unit 2, Technical Specifications (TS) be used in lieu of OMa-1988, Part 4. NRC gave verbal authorization for this temporary relief on June 30, 2000. By a second ComEd letter dated June 30, 2000, as supplemented by a letter dated July 28, 2000, ComEd requested that this temporary relief be made permanent and be extended to Unit 3.

The staff has reviewed ComEd's request and concludes that the proposed alternative provides an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the alternative is authorized for the third 10-year interval of the inservice inspection program at Dresden, Units 2 and 3. The temporary relief authorized for Dresden, Unit 2, on June 30, 2000, expires with issuance of this relief.

The staff's Safety Evaluation for the temporary and permanent reliefs is enclosed. This completes the staff's effort for TAC Nos. MA9354, MA9375 and MA9376.

Sincerely,

/RA/

Anthony J. Mendiola, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure: As stated

cc w/encl: See next page

The staff's Safety Evaluation for the temporary and permanent reliefs is enclosed. This completes the staff's effort for TAC Nos. MA9354, MA9375 and MA9376.

Sincerely,

/RA/

Anthony J. Mendiola, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure: As stated

cc w/encl: See next page

DISTRIBUTION:

PUBLIC	PD3 r/f
OGC, O15B18	ACRS, T2E26
MRing, RIII	A.J.Lee

*see previous page for concurrence

ACCESSION NO.: ML003754220

OFFICE	PM:LPD3	LA:LPD3	SC:EMEB	OGC	NLO	SC:LPD3
NAME	LROSSBACH/ DMSKAY for/	CMOORE	KMANOLY*	SUTTAL		AMENDIOLA
DATE	09/11/00	09/11/00	09/05/00	09/22/00		09/26/00

OFFICIAL RECORD COPY

O. Kingsley
Commonwealth Edison Company

Dresden Nuclear Power Station
Units 2 and 3

cc:

Commonwealth Edison Company
Site Vice President - Dresden
6500 N. Dresden Road
Morris, Illinois 60450-9765

Mr. David Helwig
Senior Vice President
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Commonwealth Edison Company
Dresden Station Manager
6500 N. Dresden Road
Morris, Illinois 60450-9765

Mr. Gene H. Stanley
Vice President - Nuclear Operations
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

U.S. Nuclear Regulatory Commission
Dresden Resident Inspectors Office
6500 N. Dresden Road
Morris, Illinois 60450-9766

Mr. Christopher Crane
Senior VP - Nuclear Operations
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Regional Administrator
U.S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Mr. R. M. Krich
Vice President - Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, Illinois 60515

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Chairman
Grundy County Board
Administration Building
1320 Union Street
Morris, Illinois 60450

Ms. Pamela B. Stroebel
Senior Vice President and General Counsel
Commonwealth Edison Company
P.O. Box 767
Chicago, Illinois 60690-0767

Document Control Desk-Licensing
Commonwealth Edison Company
1400 Opus Place, Suite 400
Downers Grove, Illinois 60515

Commonwealth Edison Company
Reg. Assurance Manager - Dresden
6500 N. Dresden Road
Morris, Illinois 60450-9765

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO ALTERNATIVE TO SNUBBER VISUAL EXAMINATION PROGRAM
COMMONWEALTH EDISON COMPANY
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

Technical Specifications (TS) for Dresden Nuclear Power Station, Units 2 and 3, state that the inservice inspection (ISI) of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components will be performed in accordance with Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," of the ASME Boiler and Pressure Vessel Code (ASME Code) and applicable addenda as required by Title 10 of the Code of Federal Regulations (10 CFR) Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). It states in 10 CFR 50.55a(a)(3) that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if:

- (i) the proposed alternatives would provide an acceptable level of quality and safety, or
- (ii) compliance with the specified requirements would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) must meet the requirements, except the design and access provisions and the pre-service examination requirements, set forth in the ASME Code, Section XI, to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulation requires that inservice examination of components and system pressure tests conducted during the first 10-year interval and subsequent intervals comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b), 12 months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable edition of Section XI of the ASME Code for the Dresden third 10-year ISI interval is the 1989 Edition.

By letter dated June 30, 2000, Commonwealth Edison Company (ComEd, the licensee) requested temporary relief, pursuant to the provisions of 10 CFR 50.55a(a)(3)(i), from the

Enclosure

requirements of the ASME Code, Section XI, 1989 Edition, for snubber visual examination. The Dresden ISI program is required to be performed, in accordance with ASME Code, Section XI, 1989 Edition, Articles IWF-5200(a) and IWF-5300(a), which reference the first addenda to ASME/ANSI OM Standard, 1987 Edition, Part 4, published in 1988 (OMa-1988, Part 4). The licensee requested that the visual examination program for snubbers in Section 3/4.8.F of the Dresden TS be used in lieu of OMa-1988, Part 4, required by ASME Code, Section XI. NRC granted verbal approval of this temporary relief request on June 30, 2000, as documented in a letter from NRC to ComEd dated July 7, 2000.

By a second letter dated June 30, 2000, ComEd requested that this temporary relief be made permanent and be extended to Unit 3. On July 20, 2000, a teleconference was held with the licensee to communicate NRC staff comments and questions regarding the information provided in the licensee's June 30, 2000, submittal. Subsequently, the licensee submitted a letter dated July 28, 2000, to provide its response to the staff questions and clarifications concerning the proposed program.

2.0 EVALUATION

The licensee stated in the June 30, 2000, submittals, that the current Dresden TS include a comprehensive program for visual examination for all safety-related hydraulic and mechanical snubbers. The licensee stated in its July 28, 2000, letter, that the Dresden TSs require visual examination of all 189 ASME Code Class 1, 2, and 3 safety-related snubbers, and of 3 safety-related non-Code snubbers (installed in Unit 2 only). The licensee also stated that the overlap of the visual examination program according to the Dresden TS and ASME Code, Section XI, 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 percent of all safety-related snubbers and incorporates the alternate snubber visual examination schedule described in Generic Letter (GL) 90-09, "Alternate Requirements for Snubber Visual Inspection Intervals and Corrective Actions." 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. It accommodates a fuel 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. This alternate schedule maintains the same confidence in the level of quality and safety as that of OMa-1988, Part 4, and is acceptable to the staff.

The licensee stated in the June 30, 2000, submittals, that visual examiners, who are qualified to the applicable rules of ASME Code, Section XI, Article IWA-2000, "Examination and Inspection," will perform the examinations for the Code Class snubbers. In addition, visual examination results of the Code Class snubbers will be recorded and reported in accordance with the applicable rules of ASME Code, Section XI, Article IWA-6000. This is also acceptable to the staff.

The staff has determined 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. The staff has also

determined that requiring the use of both the OMa-1988, Part 4, and Dresden's TS for visual examination of Code Class 1, 2, and 3 snubbers would not result in any safety benefits at Dresden, Units 2 and 3.

3.0 CONCLUSION

Based on the information provided, the staff has determined that the licensee has presented an adequate justification for both the temporary and permanent relief requests from the requirements of ASME Code, 1989 Edition, Section XI, Articles IWF-5200(a) and IWF-5300(a) (which reference OMa-1988, Part 4), with regard to visual examination of snubbers. The staff has determined that the proposed alternative use of the TS for Dresden snubber visual examination would provide an acceptable level of quality and safety. Therefore, pursuant to 10 CFR 50.55a(a)(3)(i), the licensee's request for relief is authorized for the third 10-year interval of the Dresden ISI program. The temporary relief authorized on June 30, 2000, expires with issuance of this permanent relief.

Principal Contributors: A. J. Lee, EMEB
L. W. Rossbach, DLPM

Date: September 26, 2000