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10CFR50.12

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

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

Subject: Supplemental Information for Request for Scheduling Exemption
10 CFR 50.55a(g)(6)(ii)(B) Expedited Examination of Containmentment

Reference: Letter from Preston Swafford (Exelon) to U.S. NRC, "Request for
Scheduling Exemption 10 CFR 50.55a(g)(6)(ii)(B) Expedited
Examination of Containmentment," dated December 8, 2000

In the referenced letter, Exelon Nuclear requested a scheduling exemption for Dresden Nuclear Power Station (DNPS), Unit 2, from implementation of inservice examinations of the containment by September 9, 2001, as required by 10 CFR 50.55a(g)(6)(ii)(B), "Expedited examination of containmentment." This scheduling exemption was requested to extend the implementation date by 90 days to allow completion of first period examinations during the next Unit 2 refueling outage, currently scheduled to begin in October 2001.

A teleconference with the NRC was held on December 20, 2000, to discuss our submittal. The NRC requested additional information in order to complete its review. Our response is included as an attachment to this letter.

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: Response to 10 CFR 50.55a(g)(6)(ii)(B) Request for Scheduling Exemption
Questions

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

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DRESDEN NUCLEAR POWER STATION UNITS 2 AND 3
Response to 10 CFR 50.55a(g)(6)(ii)(B)
Request for Scheduler Exemption Questions

- References: (1) Letter from R.M. Krich (ComEd) to U.S. NRC, "Request for Inservice Inspection Program Relief Regarding Containment Inspections by Approved Alternate Means," dated May 8, 2000
- (2) Letter from A.J. Mendiola (U.S. NRC) to O.D. Kingsley (ComEd), "Byron, Dresden and LaSalle – Evaluation of Relief Requests: Use of 1998 Edition of Subsections IWE and IWL of the ASME Code for Containment Inspection," dated September 18, 2000

Question: Why did Dresden Nuclear Power Station (DNPS) wait to request the use of the ASME B&PV Code XI, Subsection IWE 1998 Edition until after the last available refueling outage (D2R16)?

Response: Due to a lack of planning and oversight prior to the last refueling outage (D2R16) and without any relief requests submitted, a work scope was developed that would meet the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code XI, "Rules for Inservice Inspection of Nuclear Plant Components," Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Plants," 1992 Edition with 1992 Addenda, except for those requirements where relief was to be requested. It was believed at the time that these actions, with approval of a relief request submitted after the refueling outage, would satisfy the Period 1 inspection requirements.

However, due to a lack of understanding of the ASME Code requirements and incomplete ISI program documents, a number of the examinations performed during D2R16 did not meet the requirements of the ASME B&PV Code XI, Subsection IWE 1992 Edition with 1992 Addenda. In addition, it was subsequently determined that those examinations in compliance with the ASME B&PV Code XI, Subsection IWE 1992 Edition with 1992 Addenda did not meet the requirements of the planned relief request, which utilizes the 1998 Edition of ASME B&PV Code XI, Subsection IWE. Therefore, after the refueling outage, it was determined that all Period 1 examinations needed to be re-done, in accordance with the 1998 Edition.

Exelon then decided to make a three station submittal, noted in Reference (1), requesting approval to use ASME B&PV Code XI, Subsection IWE, 1998 Edition in lieu of the 1992 Edition with 1992 Addenda. In that submittal the need for a scheduler exemption was identified and it was noted that it would be submitted separately. Given the multi-station submittal, it was decided by DNPS that the scheduler submittal should wait until use of the 1998 Edition was approved.

DRESDEN NUCLEAR POWER STATION UNITS 2 AND 3
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DNPS has since taken actions to correct the deficiencies in the Containment ISI program. Period 1 inspections were successfully completed for Unit 3 during the last refueling outage, completed on October 3, 2000.

The Unit 2 portion of the program is being developed to support completion of Period 1 examinations on Unit 2 by the end of the upcoming refueling outage. These actions will result in performance of all Period 1 examinations for Unit 2 and 3 in accordance with Relief Request MCR-02 (1998 Edition).

Question: What ASME Subsection IWE components were inspected during the last refueling outage (D2R16)?

Response: The following Table summarizes the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code XI, "Rules for Inservice Inspection of Nuclear Plant Components," Subsection IWE, "Requirements for Class MC and Metallic Liners of Class CC Components of Light-Water Cooled Plants" components that were inspected during the first inspection period.

**DRESDEN NUCLEAR POWER STATION UNITS 2 AND 3
Response to 10 CFR 50.55a(g)(6)(ii)(B)
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ASME Section XI, Subsection IWE, First Period Inspection Requirements Applicable to Dresden Nuclear Power Station Unit 2					
Category	Item	Description	Components Inspected	Conditions Found	Compliance with 92 Edition with 92 Addenda
E-A	E.11	General Visual examination of accessible surface areas.	General Visual examination was performed during D2R16.	Examination revealed no degradation of accessible containment surfaces.	General Visual examination was in compliance with 92 Edition with 92 Addenda.
E-D	E5.10 E5.20	VT-3 of Seals VT-3 of Gaskets	Gaskets associated with the following disassembled connections were inspected (VT-3): <ul style="list-style-type: none"> ◆ Two suppression chamber access hatches. ◆ Two shear lug hatches ◆ Two equalizing valves 	Two shear lugs failed their LLRTs. Connections were disassembled and gaskets were visually examined. The gaskets were found degraded from age and were replaced. Remaining gaskets were acceptable.	Examination requirements for Item Numbers E5.10 and E5.20 were not met. Intended to request relief from the requirements of these item numbers. A relief request was prepared to credit App. J in lieu of the VT-3 of seals and gaskets. This relief request was canceled in lieu of Relief Request MCR-02 (Reference 1), which exempts gaskets and seals.
	E5.30	VT-3 of Moisture Barriers	25% (1 of 4) of the moisture barriers were inspected.	Inspection of the drywell to basemat moisture barrier revealed degradation due to age. Based on visual inspection of the liner adjacent to the moisture barrier, the degradation was not significant enough to permit corrosion of the liner. Replacement of the moisture barrier is scheduled during D2R17.	VT-3 examinations were in compliance with 92 Edition with 92 Addenda.

**DRESDEN NUCLEAR POWER STATION UNITS 2 AND 3
 Response to 10 CFR 50.55a(g)(6)(ii)(B)
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ASME Section XI, Subsection IWE, First Period Inspection Requirements Applicable to Dresden Nuclear Power Station Unit 2					
Category	Item	Description	Components Inspected.	Conditions Found	Compliance
E-G	E8.10	VT-1 of Bolted Connections (All disassembled connections must be inspected)	Bolting associated with the following disassembled connections were inspected (VT-1): <ul style="list-style-type: none"> ◆ Two suppression chamber access hatches ◆ Two shear lug hatches ◆ Two equalizing valves ◆ Five additional shear lug hatches were inspected in place 	No recordable degradation of the bolted connections was observed.	Examination Requirements were not met since all disassembled connections were not inspected during D2R16.