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Exelon Nuclear

10 CFR 50.73

April 12, 2001

PSLTR: #01-0040

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

Dresden Nuclear Power Station, Unit 3
Facility Operating License No. DPR-25
NRC Docket No. 50-249

Subject: Supplement to Licensee Event Report 1999-004-01, "Supplement to Enforcement Discretion Required for Target Rock Safety/Relief Valve Inoperability"

Enclosed is a supplement to Licensee Event Report 1999-004-01, "Supplement to Enforcement Discretion Required for Target Rock Safety/Relief Valve Inoperability," for the Dresden Nuclear Power Station (DNPS). This condition is being reported pursuant to 10 CFR 50.73 (a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the plant's Technical Specifications.

The following actions were taken:

ComEd requested exigent review of the proposed amendment pursuant to the provisions of 10 CFR50.91 (a)(6)(i)(B)(vi). (Complete)

The Target Rock SRV was replaced during D3R16. (Complete)

The bellows leak alarm pressure switch was replaced in D3R16. (Complete)

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

Respectfully,

Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Enclosure

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

NRC FORM 366 (6-1998) U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT (LER)

APPROVED BY OMB NO. 3150-0104
EXPIRES 06/30/2001

Estimated burden per response to comply with this mandatory information collection request: 50 hrs. Reported lessons learned are incorporated into the licensing process and fed back to industry. Forward comments regarding burden estimate to the information and Records Management Branch (t-6 f33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0104), Office Of Management And Budget, Washington, DC 20503. If an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

FACILITY NAME (1)	DOCKET NUMBER (2)	PAGE (3)
Dresden Nuclear Power Station, Unit 3	05000249	1 of 3

TITLE (4)
Enforcement Discretion Required for Target Rock Safety Relief Valve Inoperability

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)	
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAME	DOCKET NUMBER
									N/A	N/A
05	03	1999	1999	004	01	04	12	2001	FACILITY NAME N/A	DOCKET NUMBER N/A

OPERATING MODE (9)	1	THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR § (Check one or more) (11)							
POWER LEVEL (10)	100		20.2201(b)		20.2203(a)(2)(v)	X	50.73(a)(2)(i)		50.73(a)(2)(viii)
			20.2203(a)(1)		20.2203(a)(3)(i)		50.73(a)(2)(ii)		50.73(a)(2)(x)
			20.2203(a)(2)(i))		20.2203(a)(3)(ii)		50.73(a)(2)(iii)		73.71
			20.2203(a)(2)(ii)		20.2203(a)(4)		50.73(a)(2)(iv)		OTHER
			20.2203(a)(2)(iii)		50.36(c)(1)		50.73(a)(2)(v)		Specify in Abstract below or in NRC Form 366A
			20.2203(a)(2)(iv)		50.36(c)(2)		50.73(a)(2)(vii)		

LICENSEE CONTACT FOR THIS LER (12)

NAME	TELEPHONE NUMBER (Include Area Code)
Timothy P. Heisterman, Regulatory Assurance	(815) 942-2920 Ext. 3324

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX		CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO EPIX

SUPPLEMENTAL REPORT EXPECTED (14)				EXPECTED SUBMISSION DATE (15)	MONTH	DAY	YEAR
	YES (If yes, complete EXPECTED SUBMISSION DATE).	X	NO				

ABSTRACT (Limit to 1400 spaces, i. e., approximately 15 single-spaced typewritten lines) (16)

At approximately 1951 hours on May 3, 1999, an annunciator, indicating a possible pilot valve bellows failure for the Target Rock safety relief valve, was received in the Unit 3 control room. The failure of the pilot valve bellows prevents the Target Rock from functioning as a safety valve. Although the pressure safety function is inhibited, the pressure relief capability was not impacted. The action statement associated with an inoperable safety valve required that the unit be in hot shutdown within 12 hours and cold shutdown within the next 24 hours. Preparation for a plant shutdown was commenced. Concurrently, the Notice of Enforcement Discretion (NOED) process was also initiated. At approximately 0215 hours on May 4, 1999, the NRC granted verbal approval of the NOED. The NOED request was docketed on May 4, 1999. Although a NOED was granted, which allows continued operation, current Technical Specification 3.6.E requires the plant to be in hot shutdown in 12 hours and cold shutdown in 24 hours. Unit 3 did not reach hot shutdown in the 12-hour time duration. Corrective actions included submittal of an Exigent Technical Specification Amendment.

The Target Rock safety relief valve was removed from Unit 3 in D3R16, packaged and shipped offsite. The valve underwent bellows leak testing with steam and nitrogen. Both tests confirmed the bellows was intact and no leak existed. Confirmation of pressure switch malfunction could not be obtained as the switch was replaced and the old switch discarded. Based on the bellows leaking testing of the Target Rock valve, it is concluded that the valve safety function was available and the alarm was caused by a faulty pressure switch.

This LER is being submitted pursuant to 10 CFR 50.73(a)(2)(i)(B), which requires the reporting of any operation or condition prohibited by the plant's technical specifications. The Target Rock Valve is not assumed to operate in the Plant's Transient Analysis. Therefore, the safety significance of this condition is minimal.

PLANT AND SYSTEM IDENTIFICATION:

General Electric – Boiling Water Reactor – 2527 MWt rated core thermal power

Energy Industry Identification System (EIIS) Codes are identified in the text as [XX] and are obtained from IEEE Standard 805-1984, IEEE Recommended Practice for System Identification in Nuclear Power Plants and Related Facilities.

EVENT IDENTIFICATION:

Enforcement Discretion Required for Target Rock Safety/Relief Valve Inoperability

A. PLANT CONDITIONS PRIOR TO EVENT:

Unit: 3 Event Date: 05-03-1999 Event Time: 1951 CDT
Reactor Mode: 1 Mode Name: Run Power Level: 100
Reactor Coolant System Pressure: 1000 psig

B. DESCRIPTION OF EVENT:

Dresden Nuclear Station, Unit 3, has 13 safety and relief valves. One of the 13 valves, manufactured by Target Rock, serves a safety and relief function. Technical Specification (TS) 3.6.E requires nine valves to be OPERABLE in Modes 1, 2 and 3. With any one valve inoperable, a plant shutdown is required.

At approximately 1951 hours on May 3, 1999, an annunciator, indicating a possible pilot valve bellows failure for the Target Rock safety relief valve, was received in the Unit 3 control room. The failure of the pilot valve bellows prevents the Target Rock from functioning as a safety valve. Although the pressure safety function is inhibited, the pressure relief capability was not impacted. The action statement associated with an inoperable safety valve required that the unit be in hot shutdown within 12 hours and cold shutdown within the next 24 hours. Preparation for a plant shutdown was commenced. Concurrently, the Notice of Enforcement Discretion (NOED) process was also initiated. At approximately 0215 hours on May 4, 1999, the NRC granted verbal approval of the NOED. The NOED request, referenced above, was docketed on May 4, 1999.

C. CAUSE OF EVENT:

The cause of the event was concluded to be a malfunction of the pressure switch. The annunciator cleared and re-alarmed subsequent to this event, which supports this conclusion. Bellows leak testing of the Target Rock valve confirmed no bellows leak existed. Malfunction of the pressure switch could not be confirmed, as the removed switch was discarded. Although the pressure switch was discarded prior to troubleshooting, all subsequent testing of the valve was found acceptable. This supports the conclusion that the pressure switch was malfunctioning.

D. SAFETY ANALYSIS

The American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code requires that each vessel designed to meet ASME Section III be protected from the consequences of pressures and temperatures in excess of design conditions. Main Steam Safety Valves are sized to protect the reactor vessel against postulated overpressure events. Current TS require nine (9) safety valves to be OPERABLE during MODES 1, 2, and 3. UFSAR Section 5.2.2.2.1 states that the number of valves required for ASME B&PV Code compliance is three (3). The recent cycle specific plant transient analysis assumes only eight valves and does not credit the Target Rock safety relief valve. In addition, other conservative assumptions used in the transient analyses, such as 103 percent of the setpoint value, the fastest MSIV closure time allowed by TSs, and reduced safety valve flow rates, provide additional assurance that the loss of the safety mode function of the Target Rock valve does not impact the results of the ASME B&PV Code overpressure analysis. Therefore the current TS is overly conservative.

A review of the design basis for Unit 3 indicates that the Target Rock relief function is credited in other accident and transient events; and the relief function remains available. The Target Rock valve safety function is not credited in other design basis events. Therefore, there is no risk associated with having the Target Rock valve safety mode function out of service.

E. CORRECTIVE ACTIONS:

ComEd requested exigent review of the proposed amendment pursuant to the provisions of 10 CFR50.91 (a)(6)(i)(B)(vi). (Complete)

The Target Rock SRV was replaced during D3R16. (WR 990046067) (Complete)

The bellow leak alarm pressure switch was replaced in D3R16. (WR 990046067) (Complete)

F. PREVIOUS OCCURRENCES:

None

G. COMPONENT FAILURE DATA:

None