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10 CFR 50 Appendix H

May 23, 2001

PSLTR-01-0058

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 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

- References:
- (1) Letter from Preston Swafford (Commonwealth Edison Company) to NRC, "Revision to Reactor Vessel Material Specimen Removal Schedule," dated July 28, 2000
  - (2) Letter from Anthony J. Mendiola (NRC) to O.D. Kingsley (Commonwealth Edison Company), "Dresden Units 2 and 3 - Approval of Reactor Pressure Vessel Surveillance Capsule Withdrawal Schedule," dated December 22, 2000
  - (3) Letter from Jack Strosnider (NRC) to Carl Terry (BWRVIP Chairman), "BWR Integrated Surveillance Program (BWRVIP-78)," dated May 16, 2000
  - (4) Letter from Carl Terry (BWRVIP Chairman) to C.E. Carpenter (NRC), "Project 704 - BWRVIP-86: BWR Vessel and Internals Project, BWR Integrated Surveillance Program Implementation Plan," dated December 22, 2000
  - (5) Letter from Lawrence W. Rossbach (NRC) to O.D. Kingsley (Commonwealth Edison Company), "Dresden - Issuance of Amendments - Revised Pressure-Temperature Limits," dated September 19, 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 Currently, capsules are scheduled to be withdrawn from Unit 2 during the refueling outage D2R17 in October 2001 and from Unit 3 during the refueling outage D3R17 in October 2002. This current schedule is based on a one-cycle deferral that was

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requested by Commonwealth Edison (ComEd) Company, now Exelon Generation Company (EGC), LLC, in Reference 1 and approved in Reference 2. We are requesting deferral of the withdrawals for one additional fuel cycle to coincide with refueling outages in October 2003 (i.e., D2R18) and October 2004 (i.e., D3R18). As discussed below, these proposed changes meet the applicable criteria described in Reference 3.

In response to 10 CFR 50 Appendix H, Section III.C, "Requirements for an Integrated Surveillance Program," the BWR Vessels and Internals Project (BWRVIP) 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. EGC, 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 representative of several RPVs 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 implementation program for ISP is detailed in Reference 4.

The NRC, in Reference 3, endorsed the concept of a one-cycle deferral to support the ISP and stated the deferral requests should address three criteria. In support of this new deferral request, our review is provided below.

The deferral of the removal of the RPV surveillance capsules from DNPS Unit 2 is consistent with the BWRVIP-86, which does not call for any further capsule removals from this unit. DNPS Unit 3 remains a target plant in BWRVIP-86, which currently states that DNPS Unit 3 will remove a capsule in 2005. The first opportunity after 2005 to remove a coupon from Dresden 3 will be during D3R19 in 2006. At this outage, DNPS Unit 3 will have accumulated 23.1 Effective Full Power Years (EFPY) of operation. This value includes two cycles of operation at Extended Power Uprate (EPU) conditions. Therefore, we have concluded that the deferral of capsule removal for DNPS Units 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. In Reference 5, the NRC approved a license amendment request that revised the DNPS pressure-temperature (P-T) curves and extended them to 32 EFPY. These curves are subject to a license condition that requires NRC approval for their use beyond November 30, 2001. However, no capsule removal is required to support these P-T curves. In addition, the data from the capsules would not be expected to provide Charpy shift values above the 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, "Radiation Embrittlement of Reactor Vessel Materials," Revision 2, equation (2).

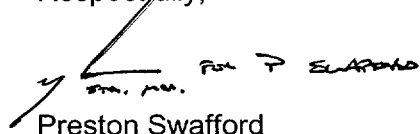
As a result of deferring the capsule removals, the dosimetry information that is not obtained will not affect the validity of the RPV integrity assessments through the period of the deferral. The DNPS operating times are currently 19 EFPY for Unit 2 and 17.3 EFPY for Unit 3. The maximum vessel operating times attained at the end of the proposed deferral period will be 21.6 EFPY for Unit 2 and 20.9 EFPY for Unit 3 including one cycle of operation for each unit at EPU conditions. These operating times are less than the 32 EFPY P-T curves and thus the projected fluence will not exceed what is currently approved.

In summary, we believe the proposed additional one-cycle deferral of the RPV material surveillance capsule withdrawal for both units is acceptable because it is consistent with the intent of the proposed BWRVIP ISP, it will not delay data needed to support existing reactor vessel evaluation requirements, and it will not affect the reactor vessel integrity assessment during the deferral period. Therefore, we request deferral of the RPV capsule withdrawals for one additional fuel cycle to coincide with refueling outages in October 2003 for Unit 2 and October 2004 for Unit 3.

We are requesting your review and concurrence by September 14, 2001.

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

Respectfully,

A handwritten signature in black ink, appearing to read "Preston Swafford", with a large, sweeping flourish extending upwards and to the left.

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