Exelon Generation Company, LLC
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, IL 60450-9765

www.exeloncorp.com

Exelon Nuclear

10 CFR 55a

May 23, 2001

PSLTR: 01-0057

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

Dresden Nuclear Power Station (DNPS) Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Request for Relief from Inservice Inspection Requirements

Reference: (1) Letter from the U.S. NRC to R.G. Lizotte (Northeast Nuclear Energy Company), "Millstone Nuclear Power Station, Unit Nos. 2 and 3 – Request for Relief (TAC No. MA9857 and MA9858)," dated January 26, 2001

In accordance with 10 CFR 50.55a, "Codes and Standards," paragraph (a)(3)(i), Exelon Generation Company (EGC), LLC, requests approval of proposed Relief Request CR-22 and Relief Request CR-23 for use at Dresden Nuclear Power Station (DNPS), Units 2 and 3. The bases of the relief requests are that the proposed alternatives would provide an acceptable level of quality and safety. Relief Request CR-22 requests relief from the annual ultrasonic training provisions of Subsubarticle VII-4240, "Annual Training," of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, 1995 Edition with the 1996 Addenda, Appendix VII. Relief Request CR-23 requests relief from the statistical parameters of Subparagraph 3.2(c) of Section XI of the ASME Code, 1995 Edition with the 1996 Addenda, Appendix VIII, Supplement 4.

The proposed relief requests are similar to relief requests approved by the NRC for use at Millstone Nuclear Power Station (Reference 1).

It is requested that these proposed relief requests be approved by October 2001 to allow their use in the upcoming Dresden Nuclear Power Station, Unit 2 refuel outage currently scheduled to begin October 20, 2001.

A047

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

Respectfully,

R Fisher
SVP for PS

Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Attachment

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

bcc: Project Manager – NRR
Officer of Nuclear Facility Safety – IDNS
Senior Reactor Analyst – IDNS
Manager of Energy Practice – Winston and Strawn
Director - Licensing, Mid-West Regional Operating Group
Manager - Licensing, Dresden and Quad Cities Stations
Nuclear Licensing Administrator, Dresden Nuclear Power Station
Mid-West Regional Operating Group Document Control Desk – Licensing (Hard Copy)
Mid-West Regional Operating Group Document Control Desk – Licensing (Electronic Copy)
Regulatory Assurance Manager – Dresden Nuclear Power Station
Regulatory Assurance Manager – Quad Cities Nuclear Power Station
NRC Coordinator – Dresden Nuclear Power Station
NSRB Site Coordinator – Dresden Nuclear Power Station
Roger Bauman – Dresden Nuclear Power Station
SVP Numerical File – PSLTR #01-0057

Relief Request Number: CR-22
(Page 1 of 3)

COMPONENT IDENTIFICATION

Code Class:	All
Reference:	ASME Section XI, 1995 Edition with 1996 Addenda, Appendix VII, Subsubarticle VII-4240, "Annual Training"
Examination Categories:	All categories for components subject to Ultrasonic Examination
Item Number:	All item numbers for components subject to Ultrasonic Examination
Description:	Alternative Requirements to ASME Section XI, 1995 Edition with 1996 Addenda, Appendix VII, Subsubarticle VII-4240, "Annual Training"
Component Numbers:	All Components Subject to Ultrasonic Examination

CODE REQUIREMENT

10 CFR 50.55a, "Codes and Standards," paragraph (b)(2) incorporates by reference the 1995 Edition and Addenda through 1996 of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for use in preparing inservice inspection programs. Subsubarticle VII-4240, "Annual Training," of Section XI of the ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII, requires a minimum of 10 hours annual training.

10 CFR 50.55a(b)(2)(xiv), "Appendix VIII personnel qualification," requires that all personnel qualified to perform ultrasonic examinations in accordance with Section XI of the ASME Code, Appendix VIII, shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be completed no earlier than 6 months prior to performing ultrasonic examinations at a licensee's facility.

CODE REQUIREMENT FOR WHICH RELIEF IS REQUESTED

Relief is requested from the training provisions of Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII.

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the training provision of Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII, that requires a minimum of 10 hours annual training. The basis of the relief request is that the proposed alternative would provide an acceptable level of quality and safety.

Relief Request Number: CR-22

On September 22, 1999, the NRC published a final rule in the Federal Register (64 FR 51370) to amend 10 CFR 50.55a(b)(2), to incorporate by reference the 1995 Edition and addenda through the 1996 Addenda, of Section XI of ASME Code. The change included the requirement to have a minimum of 10 hours of annual training contained in Subsubarticle VII-4240 of Section XI of ASME Code.

Additionally, the September 22, 1999, Federal Register notice amended 10 CFR 50.55a(b)(2)(xiv). The amended 10 CFR 50.55a(b)(2)(xiv) requires that all personnel qualified to perform ultrasonic examinations in accordance with Appendix VIII of the ASME Code shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be taken no earlier than 6 months prior to performing examinations at a licensee's facility. Paragraph 2.4.1.1.1 in the Federal Register notice contained the following statement which includes a discussion of the Electric Power Research Institute (EPRI) Performance Demonstration Initiative (PDI) program.

> "The NRC had determined that this requirement (i.e., Subsubarticle VII-4240) was inadequate for two reasons. The first reason was that the training does not require laboratory work and examination of flawed specimens. Signals can be difficult to interpret and, as detailed in the regulatory analysis for this rulemaking, experience and studies indicate that the examiner must practice on a frequent basis to maintain the capability for proper interpretation. The second reason is related to the length of training and its frequency. Studies have shown that an examiner's capability begins to diminish within approximately 6 months if skills are not maintained. Thus, the NRC had determined that 10 hours of annual training is not sufficient practice to maintain skills, and that an examiner must practice on a more frequent basis to maintain proper skill level... The PDI program has adopted a requirement for 8 hours of training, but it is required to be hands-on practice. In addition, the training must be taken no earlier than 6 months prior to performing examinations at a licensee's facility. PDI believes that 8 hours will be acceptable relative to an examiner's abilities in this highly specialized skill area because personnel can gain knowledge of new developments, material failure modes, and other pertinent technical topics through other means. Thus, the NRC has decided to adopt in the Final Rule the PDI position on this matter. These changes are reflected in 10CFR50.55a(b)(2)(xiv) of the final rule."

Implementation of the training requirements contained in Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII and 10CFR50.55a(b)(2)(xiv) will result in redundant training programs. The approval of this relief request to qualify our personnel to perform ultrasonic examinations in accordance with 10CFR50.55a(b)(2)(xiv) will simplify record keeping, satisfy the need to maintain skills, and provide an acceptable level of quality and safety.

Relief Request Number: CR-22
(Page 3 of 3)

PROPOSED ALTERNATIVE PROVISIONS

Annual ultrasonic training shall be conducted in accordance with 10 CFR 50.55a(b)(2)(xiv) in lieu of Subsubarticle VII-4240 of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VII. The annual ultrasonic training shall require that all personnel qualified for performing ultrasonic examinations in accordance with Section XI of the ASME Code, Appendix VIII, shall receive 8 hours of annual hands-on training on specimens that contain cracks. This training must be completed no earlier than 6 months prior to performing ultrasonic examinations at a licensee's facility.

APPLICABLE TIME PERIOD

This alternative is requested for the remaining duration of the third inspection period of the third interval for Dresden Nuclear Power Station, Unit 2 and Unit 3.

Relief Request Number: CR-23
(Page 1 of 2)

COMPONENT IDENTIFICATION

Code Class:	Class 1
Reference:	ASME Section XI, 1989 Edition, Table IWB-2500-1
	ASME Section XI, 1995 Edition with 1996 Addenda, Appendix VIII, Supplement 4, Subparagraph 3.2(b)
Examination Category:	B-A
Item Numbers:	B1.10, B1.11, B1.12, B1.20, B1.21, B1.22, B1.50, B1.51
Description:	Alternative requirements to Appendix VIII, Supplement 4, "Qualification Requirements for the Clad/Base Metal Interface of Reactor Vessel"
Component Numbers:	All Components

CODE REQUIREMENT

10 CFR 50.55a(b)(2) incorporates by reference, the 1995 Edition and Addenda through 1996 of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code for use in preparing inservice inspection programs.

Subparagraph 3.2(c) of Section XI of the ASME Code, Appendix VIII, Supplement 4, requires that the ultrasonic testing (UT) performance demonstration results be plotted on a two dimensional plot with the measured depth plotted along the ordinate axis and the true depth plotted along the abscissa axis. For qualification, the plot must satisfy the statistical parameters identified in Subparagraph 3.2(c).

CODE REQUIREMENT FOR WHICH RELIEF IS REQUESTED

Relief is requested from applying the statistical parameters identified Subparagraph 3.2(c) of Section XI of the ASME Code, Appendix VIII, Supplement 4.

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested from the statistical parameters identified in Subparagraph 3.2(c) of Section XI of the ASME Code, Appendix VIII, Supplement 4. The basis of the relief requests is that the proposed alternatives would provide an acceptable level of quality and safety.

On September 22, 1999, the NRC published a final rule in the Federal Register (64 FR 51378) to amend 10 CFR 50.55a(b)(2), to incorporate by reference the 1995 Edition and addenda through the 1996 Addenda, of Section XI of ASME Code. The change included the provisions of Subparagraph 3.2(a), 3.2(b) and 3.2(c) of Section XI of the ASME Code, 1995 Edition with the 1996 Addenda, Appendix VIII, Supplement 4.

Relief Request Number: CR-23

Additionally, the September 22, 1999, Federal Register amended 10 CFR 50.55a(b)(2)(xv)(C)(1). The amended 10 CFR 50.55a(b)(2)(xv)(C)(1) requires a depth sizing acceptance criterion of 0.15 inch Root Mean Square (RMS) to be used in lieu of the requirements of Subparagraph 3.2(a) and 3.2(b) of Section XI of the ASME Code, Appendix VIII, Supplement 4.

On March 26, 2001, the NRC published a correction to the September 22, 1999, final rule in the Federal Register (66 FR 16390). The NRC identified that an error had occurred in the published wording of 10 CFR 50.55a(b)(2)(xv)(C)(1). The corrected 10 CFR 50.55a(b)(2)(xv)(C)(1) requires a depth sizing acceptance criterion of 0.15 inch Root Mean Square (RMS) to be used in lieu of the requirements of Subparagraph 3.2(a) and a length sizing requirement of 0.75 inch RMS to be used in lieu of the requirements 3.2(b) of Section XI of the ASME Code, Appendix VIII, Supplement 4.

The statistical parameters to be used in flaw sizing specified in Subparagraph 3.2(c) of Section XI of ASME Code, 1995 Edition with the 1996 Addenda, Appendix VIII, Supplement 4 rely upon the depth sizing acceptance criteria used in Subparagraph 3.2(a) and the length sizing acceptance criteria used in Subparagraph 3.2(b). For Supplement 4 UT performance demonstrations, the linear regression line of the data required by Subparagraph 3.2(c) is not applicable because the performance demonstrations are performed on test specimens with flaws located on the inner 15% through-wall. Additionally, the Subparagraph 3.2(c) specified value for evaluating the mean deviation of flaw depth is not restrictive enough for evaluating flaw depths within the inner 15% of wall thickness. We propose to use the 10 CFR 50.55a(b)(2)(xv)(C)(1) RMS calculations of Subparagraph 3.2(a), which utilizes an RMS value of 0.15 inch depth and the RMS calculations of Subparagraph 3.2(b), which utilizes an RMS value of 0.75 inch length in lieu of the statistical parameters of 3.2(c).

PROPOSED ALTERNATIVE PROVISIONS

The RMS calculations of Subparagraph 3.2(a) of Section XI of the ASME Code, Appendix VIII, Supplement 4, which utilize an RMS value of 0.15 depth and the RMS calculations of Subparagraph 3.2(b), which utilize an RMS value of 0.75 length shall be used in lieu of the statistical parameters of Subparagraph 3.2(c) of Section XI of the ASME Code, Appendix VIII, Supplement 4.

APPLICABLE TIME PERIOD

This alternative is requested for the remaining duration of the third inspection period of the third interval for Dresden Nuclear Power Station, Units 2 and 3.