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10 CFR 50.12

July 23, 2001

PSLTR-#01-0077

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: Clarification of Request for Schedular Exemption for Performance of Reactor Vessel Weld Examinations Required by 10 CFR 50.55(a)

Reference: Letter from Preston Swafford (EGC) to U. S. NRC, "Request for Schedular Exemption for Performance of Reactor Vessel Weld Examinations Required by 10 CFR 50.55(a)," dated June 12, 2001

In the referenced letter, in accordance with 10 CFR 50.12, "Specific exemptions," Exelon Generation Company (EGC), LLC, requested a schedular exemption from the requirements of 10 CFR 50.55a, "Codes and standards," paragraph (g)(6)(ii)(A)(2) concerning augmented inspection of Reactor Pressure Vessel welds for the Dresden Nuclear Power Station Units 2 and 3. During review of this request, the NRC found a typographical error in the attachment, which referenced an incorrect weld examination category item number in the American Society of Mechanical Engineers Boiler and Pressure Vessel Code Section XI. The justification for the schedular exemption has been revised to correct the error and is attached to this letter. A revision bar indicates the correction. The basis for the schedular exemption was not materially changed by this correction.

Should you have any questions regarding this letter, please contact Mr. Dale Ambler at (815) 416-2800.

Respectfully,

Preston Swafford

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

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ATTACHMENT
DRESDEN NUCLEAR POWER STATION UNIT 2 AND 3
JUSTIFICATION FOR SCHEDULAR EXEMPTION

EXEMPTION

Exelon Generation Company (EGC), LLC, requests a schedular exemption for Dresden Nuclear Power Station (DNPS), Units 2 and 3, from implementation of inservice examinations of the reactor pressure vessel (RPV) vertical welds and the top shell course to vessel flange weld, per American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Section XI, Table IWB-2500, "Examination Categories," items B1.12 and B1.30, by the end of the current ten year intervals, as required by 10 CFR 50.55a, "Codes and standards," paragraph (g)(6)(ii)(A)(2). The current intervals end on January 19, 2003, for DNPS Unit 2 and October 31, 2002, for DNPS Unit 3. This schedular exemption requests an extension for the performance of the third interval inspections of these welds until the completion of the D2R18 outage for Unit 2 in October 2003, and until the completion of the D3R18 outage in October 2004 for Unit 3.

DISCUSSION

DNPS, like many plants of its vintage, was neither designed nor constructed to permit easy access to the reactor vessel welds for inservice inspection. The biological shield and insulation around the RPV does not permit ready access to the outside surfaces for ultrasonic inspection. Technology was developed and successfully used to allow inspection of the welds from the inside of the RPV. Weld coverage is dependent upon the location of RPV welds with respect to jet pumps, shroud repair hardware and other internal interferences. DNPS applied for and was granted relief from performing inspection of RPV circumferential welds in References 1 and 2. DNPS is now approaching the end of the third inspection interval and therefore must perform inspections of the remaining vertical welds and the top shell course to vessel flange weld.

Due to the installed shroud repairs on both units and other interferences, the current inspection technology is projected to obtain limited coverage of approximately 60% for DNPS Units 2 and 3. A new inspection technology offers the potential of an improved coverage. However, although this system may be able to achieve coverage on lower course welds that others can not, it will require extended periods of camera support from the refuel bridge during these inspections which directly impacts outage critical path. The advantage of this new technology is that it may be capable of inspecting a significant portion of welds in the lower beltline region that, at DNPS, are not accessible to other equipment. Since industry inspections to date have not seen evidence of service induced flaws, the increased risk of extending the inspection interval is not significant. Therefore, an extension of the completion date from the end of the

interval for DNPS Unit 2 of eight months and for DNPS Unit 3 of twenty-four months to achieve increased inspection coverage without an outage schedule impact and to further tool experience and development is beneficial.

BASIS FOR RELIEF

As discussed in the following paragraphs, the requested schedular exemption meets the necessary criteria of 10CFR50.12, "Specific exemptions."

A. Criteria for granting exemptions are met in accordance with 10CFR 50.12(a)(1):

1. The requested exemptions and the activities, which would be allowed thereunder, are authorized by law

   If the criteria established in 10 CFR 50.12(a) are satisfied, as they are in this case, and if no other prohibition exists to preclude the activities which would be authorized by requested exemption, and there is no such prohibition, the commission is authorized by law to grant this exemption request.

2. The requested exemption will not present undue risk to the public

   The purpose of performing the reactor vessel inspection is to ensure the structural integrity of the reactor vessel. The requested exemption is schedular in its extent, and will result in a more complete and thorough inspection. Industry inspections to date have not identified service-induced flaws in reactor vessel welds.

3. The requested exemption will not endanger the common defense and security

   The common defense and security are not in any way compromised by this exemption.

B. At least one of the special circumstances is present in accordance with 10CFR 50.12(a)(2)

1. The requested exemption will avoid undue hardship or costs

   The requested schedular exemption is required to prevent an extension of the upcoming refueling outages. Preparations for the

upcoming DNPS Unit 2 outage is being made based on a vessel inspection window that is anticipated to be the outage critical path. Use of the new inspection technology provides a more thorough examination but extends the outage length by an estimated 64 hours. An extended inspection window would present undue hardship and cost and result in lost generation. Because the requested exemption does not jeopardize the health and safety of the public, as previously discussed, its approval is warranted.

2. The requested exemption will only provide temporary relief from the applicable regulation

The requested exemption is needed for a maximum of twenty-four months.

APPLICABLE TIME PERIOD

This schedular exemption is requested for the third ten year interval of the inservice inspection program of DNPS Unit 2 to be extended to October 2003 and of DNPS Unit 3 to be extended to October 2004.

REFERENCES

(1) Letter from J. Heffley (Commonwealth Edison Company) to U. S. NRC, "Relief Request for Alternate Weld Examination of Circumferential Reactor Pressure Vessel Shell Welds,"dated July 26, 1999

(2) Letter from U. S. NRC to O. D. Kingsley, "Dresden-Authorization for Proposed Alternative Reactor Pressure Vessel Circumferential Weld Examinations," dated February 25, 2000