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U.S. Nuclear Regulatory Commission
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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: Supplemental Information for Relief Request for Impractical Requirements for Inspection of Low Pressure Coolant Injection (LPCI) Heat Exchanger Tubesheet-to-Shell Welds

Reference: Letter from Preston Swafford to the U.S. NRC, "Relief Request for Impractical Requirements for Inspection of Low Pressure Coolant Injection (LPCI) Heat Exchanger Tubesheet to Shell Welds," dated March 14, 2001

In the referenced letter, in accordance with 10 CFR 50.55a, "Codes and Standards," paragraph (a)(3), Dresden Nuclear Power Station (DNPS) requested approval of a proposed revision to an approved alternative to existing American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." Specifically, EGC requested approval of a revision of a previously approved alternative method to inspect the Low Pressure Coolant Injection (LPCI) heat exchanger tubesheet-to-shell welds, changing the frequency of the pump operability tests from monthly to that required by the Inservice Test (IST) program.

On July 20, 2001 and July 27, 2001 teleconferences were held with the NRC and EGC personnel to discuss questions regarding this submittal. The NRC requested supplemental 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) 416-2800.

Respectfully,

Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Attachment: Response to Relief Request CR-05, "Inspection of Low Pressure Coolant Injection (LPCI) Heat Exchanger Tubesheet-to-Shell Welds" Questions

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

A047

Dresden Nuclear Power Station (DNPS) Units 2 & 3

Response to Relief Request CR-05, "Inspection of Low Pressure Coolant Injection (LPCI) Heat Exchanger Tubesheet-to-Shell Welds" Questions

Question: **Clarify the scope of changes between Relief Request CR-05, Revision 0 and Revision 1.**

Response: The primary revision to Relief Request CR-05 is with regard to the frequency in which LPCI pump operability tests are performed. The Proposed Alternatives in revision 0 stated "...the monthly LPCI pump operability test requires the operator to perform a visual inspection..." The visual inspection is performed in accordance with station surveillance procedures during the LPCI operability test and any unacceptable leakage is documented within the surveillance procedure and within the corrective actions process. Revision 1 states "...the LPCI pump operability test, performed in accordance with Dresden Station Technical Specifications, requires the operator to perform a visual inspection..."

The Technical Specifications were amended in 1996, requiring operability testing of the LPCI pumps per the requirements of the Inservice Testing (IST) Program, which is performed on a quarterly frequency. The purpose of this change is to bring the relief request into agreement with the current Technical Specification requirements and the IST Program. We believe there is no increase in safety significance since the challenge to the system is in accordance with the IST Program and the level of inspection being performed during the operability test of the LPCI system is unchanged. The remainder of the changes is administrative in nature and do not technically impact the relief request.

Question: **Provide the ISI edition/addenda of Code that apply to the UT and PT examination of the HX tubesheet-to-shell welds.**

Response: DNPS is implementing the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code XI "Rules for Inservice Inspection of Nuclear Plant Components," 1989 Edition, during the third ten-year interval of the Inservice Inspection program for DNPS Units 2 and 3.

Question: **In the submittal Figure CR-05.1, identify the weld and base material (carbon steel, stainless steel, Inconel, etc) and identify the corner trap that is interfering with UT.**

Response: The weld and base material are both carbon steel. The corner trap is located on the interior of the vessel at the inside corner of the tube sheet to shell interface.