Exelon Generation
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450-9765
Tel 815-942-2920

www.exeloncorp.com

Exelon Nuclear

March 21, 2002

PSLTR: #02-0019

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

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

Subject: 2001 Regulatory Commitment Change Summary Report

The 2001 Commitment Change Summary for Dresden Nuclear Power Station is attached to this letter. Revisions to docketed correspondence were processed using Nuclear Energy Institute (NEI) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999.

Should you have any questions concerning this summary please contact Bob Rybak, Regulatory Assurance Manager at 815-416-2800.

Respectfully,

Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Attachment: Dresden Nuclear Power Station Revised Commitment Summary for 2001

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

A001

Attachment
Dresden Nuclear Power Station
Commitment Change Summary for 2001

Commitment Revision Tracking No.	Date of Commitment Revision	Original Document	Original Commitment	Revised Commitment	Basis For Revision
01-001	VOIDED				
01-002	4/16/01	NTS 2371019600201 NLA letter from J. Hosmer to NRC 5/13/96 – response to NRC Bulletin 96-02	Prior to Dry Storage Cask movements in the Reactor Building, ComEd will demonstrate the capability of performing the actions necessary for safe shutdown in the presence of the radiological source term that may result from a breach of the dry storage cask, damage to the fuel, and damage to safety-related equipment as a result of a load drop inside the facility.	If the movement of dry storage cask at Dresden Units 2/3 requires prior NRC approval, as determined by a 10CFR 50.59 evaluation, then the submittal will include, as specified in NRCB 96-02, a statement of the capability of performing the actions necessary for safe shutdown in the presence of the radiological source term that may result from a breach of the dry storage cask, damage to the fuel, and damage to safety-related equipment as a result of a load drop inside the facility.	The current commitment is unnecessarily restrictive. NRCB 96-02 only required that such information about a load drop be provided if the licensee determined that the handling of a dry storage cask required prior NRC review and approval. Dresden Units 2/3 perform all spent fuel cask lifts in the Reactor Building utilizing a single failure proof crane equipped with a special lifting device. This special lifting device is designed in accordance with ANSI NI4.6. Cask closure of the loaded cask (in the spent fuel pool) is also performed with a single failure proof crane utilizing an ANSI NI4.6 special lifting device. Per NRC letter dated 6/3/76, U2/3 Reactor Building Crane was granted single failure proof status and thus a load drop analysis is not required to be performed. Therefore with a single failure proof crane the initial condition of a cask drop need not be considered. The proposed reworded commitment clarifies when such information is required and is consistent with NRCB 96-02.
01-003	5/9/01	NTS 2371009303408C/ NRC Inspection Report 93034	Incorporate DAP 03-20 training into Annual Maintenance and Technical Services Training.	Delete Commitment.	In the 6 years that this commitment has been in place, there has been continued reduction in the volume of portable cart restraint deficiencies. A review of CR (PIF) database results supports this statement. Additionally the current revision of DAP 03-20 now excludes a large amount of the plant Power Block area from requirements of DAP 03-20, rev 10.

Attachment
Dresden Nuclear Power Station
Commitment Change Summary for 2001

Commitment Revision Tracking No.	Date of Commitment Revision	Original Document	Original Commitment	Revised Commitment	Basis For Revision
01-004	8/8/01	Unit 3 LER 87-17, dated 10/9/87	An item will be added to the surveillance program requiring that valve PCV 2(3)-2301-46 be cleaned, lubricated, and checked for proper operation during each refueling outage.	An item will be added to the surveillance program requiring that valve PCV 2(3)-2301-46 be cleaned, lubricated, and checked for proper operation every four years.	A review of the PCV 2(3)-2301-46 surveillance (DMP 2300-08) results and maintenance history was performed. Normally gaskets, diaphragms, packing, etc. were replaced; however, PCV 2-2301-46 was significantly overhauled in 1993 and PCV 3-2301-46 in 1987 and again in 1992. There have been no failures of PCV 2(3)-2301-46 since 1987 (Unit 3 LER 87-17). Based on maintenance history and substantiated by industry experience, the inspect/clean/overhaul of PCV 2(3)-2301-46 should be performed on a 4-year frequency. Maintenance history and valve performance demonstrate that revising the frequency of the surveillance to inspect/clean/overhaul PCV 2(3)-2301-46 will not have a negative impact on HPCI System performance and thus have no adverse regulatory impact.
01-005	9/18/01	I.R. 237/91025; 249/91025	Incorporate changes into Station Administrative Procedures that were placed in effect by Operations Dept. letter as corrective actions to recent events. -Required the use of the phonetic alphabet when alphanumeric designators are used in all operations related communications. -Required 100% repeat back on all operational related instructions. -Required independent verification on all technical specification and safety-related equipment when removed from or placed in service.	Delete commitment to place these actions in administrative procedures, specifically in HU-AA-101.	The original commitment was put in place to ensure that the station was in compliance with the design basis as stated in the UFSAR. These commitments have been institutionalized within Exelon. This process has been incorporated into the NGG standard procedure revision process. The commitments have been incorporated into several Exelon standard procedures. They have also been incorporated into the Operations training as fundamentals. These fundamentals are tested during every training cycle. Self-check, 3-way communications, and independent verification practices have been ingrained into the Operators. These commitments are not required to be incorporated into Administrative procedures.

Attachment
Dresden Nuclear Power Station
Commitment Change Summary for 2001

Commitment Revision Tracking No.	Date of Commitment Revision	Original Document	Original Commitment	Revised Commitment	Basis For Revision
01-006	10/7/01	Response to NRC Bulletin 95-02, "Unexpected Clogging of a Residual Heat Removal Pump Strainer While Operating in Suppression Pool Cooling Mode"	The response states that Dresden Station uses the installation of Foreign Material Exclusion (FME) covers over the drywell vent missile shields.	The commitment will be revised to ensure that predefines for visual inspections of the vent lines are completed during the closeout of the drywell to ensure foreign material is precluded from entering the Torus.	The original commitment discusses the use of FME covers over vent lines to prevent debris accumulation in the Torus. The use of these covers is a precautionary measure. Although these covers have the potential to reduce foreign material from entering the Torus, the covers are unmanageable and frequently become dislodged from the mating surface. This is due to the inability of the covers to be directly attached to the mating surfaces from the inherent physical characteristics of the two surfaces. This commitment is being changed to discontinue the use of covers over these vent lines based on the following justification. Currently there are predefines scheduled during the outage that require the vent lines and the centipede area to be visually inspected for foreign material after all work is complete and just prior to drywell closeout. In addition, Dresden Station performs a drywell closeout inspection, which requires various departments to perform drywell inspections to ensure housekeeping is acceptable and ready for operations' final inspection, prior to Unit start-up. Coupled with the drywell closeout inspection, a suppression chamber closeout inspection is performed, which uses the benefit of divers to inspect below and at water surface for debris/foreign material. Routine walkdowns for cleanliness are performed during outage activities to ensure that areas throughout the plant are kept clean to minimize the potential for foreign material entering the plant systems. Dresden personnel are trained on the fundamentals and the impact to the plant for foreign material entering plant systems. Plant personnel are provided pre-job briefs and work packages which, as required, address the required controls for effective FME control and worker awareness is

Attachment
Dresden Nuclear Power Station
Commitment Change Summary for 2001

Commitment Revision Tracking No.	Date of Commitment Revision	Original Document	Original Commitment	Revised Commitment	Basis For Revision
					heightened through the use of procedural guidelines. Predefines have been established that require a final inspection of the vent lines upon completion of the drywell activities. This inspection requires that personnel physically enter the vent lines and perform a visual inspection to ensure that no foreign material exists in the vent lines that could be introduced into the Torus area. Therefore, based on the training techniques used, the final drywell closeout inspection performance, the suppression chamber closeout inspection, the periodic cleanliness inspections during outage activities, and the predefines that require visual inspection, post drywell activities, adequate protection is provided to ensure that foreign material is precluded from entering the Torus area and/or is removed prior to start-up.
01-007	12/21/01	Letter, Milton H. Richter to NRC, 2/6/89 "Response to NRC GL 88-14	Attachment A to the commitment source document made the following commitment regarding Instrument Air Particulate Monitoring. "… this monitoring program will sample for particles in various size ranges (0.5, 1.5, 3, 5, 10, 15 microns)."	"… this monitoring program will sample for particles in various size ranges (0.5, 3, 5 and 15)." The revised commitment will monitor four particle size ranges instead of six.	The particle counter currently being used by all former ComEd sites can only monitor four size ranges (0.5,3, 5 and 15). Since the Instrument Air Standard ANSI/ISA-57.3 requires "no particles > 3 microns," this information is still available.