

February 26, 1988

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Docket No. 50-249

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Mr. L. D. Butterfield, Jr.
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Butterfield:

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT
(TAC NO. 66937)

Re: Dresden Nuclear Power Station, Unit No. 3

I am enclosing the subject Environmental Assessment and Finding of No Significant Impact which relates to your submittal dated January 10, 1988 which requested scheduler exemptions from the requirements of Sections III.D.2(a) and III.D.3 of Appendix J to 10 CFR 50 relating to primary reactor containment leakage testing for water-cooled power reactors.

This Assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,



Marshall Grotenhuis, Senior Project Manager
Project Directorate III-2
Division of Reactor Projects - III,
IV, V, and Special Projects

Enclosure:
Environmental Assessment

cc: w/enclosure
See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSIONCOMMONWEALTH EDISON COMPANYDOCKET NO. 50-249ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of schedular exemptions from the requirements of 10 CFR 50 to the Commonwealth Edison Company (CECo) (the licensee) for the Dresden Nuclear Power Station, Unit No. 3, located at the licensee's site in Grundy County, Illinois.

ENVIRONMENTAL ASSESSMENTIdentification of the Proposed Action:

The proposed action would grant schedular exemptions from requirements of Section III.D.2(b) and III.D.3 (type B and type C tests respectively) of Appendix J to 10 CFR 50 relating to the primary reactor containment leakage testing for water-cooled reactors. The purposes of the tests are to assure that leakage through primary reactor containment shall not exceed allowable leakage rate values as specified in the Technical Specifications and that periodic surveillance is performed.

The Need for the Proposed Action:

By letter dated January 10, 1988, the licensee requested, pursuant to 10 CFR 50.12(a), a schedular exemption for Dresden Unit 3 from the 2 year test interval for certain Type B and C leak rate tests required by 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3. The exemption is requested to support the current refueling outage schedule and avoid the potential for an earlier reactor shutdown.

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The Dresden Unit 3 shutdown for its End of Cycle 9 (EOC 9) refueling and Recirculation Pipe Replacement (RPR) began on October 28, 1985. Due to the extensive RPR program, the EOC 9 outage was unusually long with startup not occurring until September 1986. Type B and C local leak rate testing commenced on September 27, 1985 and continued through August of 1986. As a result of the extensive RPR outage, a four week midcycle outage related to feedwater system problems, and other considerations, the shutdown for refueling has been delayed to March 26, 1988. Maintaining this schedule will result in exceeding the two year test interval.

Environmental Impacts of the Proposed Action:

The proposed action includes exemptions from performing certain type B and C tests for a period of 90 days from January 10, 1988. As stated in 10 CFR 50, Appendix J, the purpose of the primary containment leak rate testing requirements is to ensure that leakage rates are maintained within the Technical Specification requirements and to assure that proper maintenance and repair is performed throughout the service life of the containment boundary components. The requested exemption is consistent with this intent in that it represents a one time only scheduled extension of short duration. The required leak tests will still be performed to assess compliance with Technical Specification requirements, albeit later, and to assure that any required maintenance or repair is performed. As noted in Sections III.D.2 and III.D.3 of Appendix J, it was intended that the testing be performed during refueling outages or other convenient intervals. Extending the 2 year interval by a small amount to reach the next refueling outage will not significantly impact the integrity of the containment boundary and therefore will not significantly impact the consequences of an accident or transient in the unlikely event of such an occurrence during the 90 day extended period.

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This is further supported by the information provided in the application. The pathways affected were tested during the July 1986 Integrated Leak Rate Test (ILRT). Although some local leak rate testing intervals will exceed two years by the end of the current operating cycle, the fact that a number of these pathways were tested as part of the ILRT within two years provides assurance that containment integrity has not been compromised. In addition, the pathways for which testing would be deferred have in general demonstrated good local leak rate test results as indicated in the application. Finally, the estimated current total leakage, which was based on past data from the same pathways, from all applicable pathways is below the value allowed by the Technical Specifications.

Based on the staff's evaluation, the level of safety in the areas involved in these exemptions is equivalent to that achieved by compliance with the technical requirements of Sections III.B.2(a) and III.B.3 of Appendix J to 10 CFR Part 50. Thus, radiological releases will not differ from those determined previously and the proposed exemptions do not otherwise affect facility radiological effluents or occupational exposures. The proposed exemptions do not affect plant nonradiological effluents and have no other environmental impact. Therefore, the Commission concludes there are no measurable radiological or nonradiological environmental impacts associated with the proposed exemption.

Alternatives to the Proposed Action:

Since the Commission has concluded there is no measurable environmental impact associated with the proposed exemption, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to the exemption would be to require rigid compliance with the requirements of Section III.D.2(a) and III.D.3 of Appendix J to 10 CFR Part 50. Such action would not enhance the protection of the environment and would result in unjustified costs for the licensee.

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Alternatives to the Proposed Action: Since the Commission has concluded there is no measurable environmental impact associated with the proposed exemption, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to the exemption would be to require rigid compliance with the requirements of Section III.D.2(a) and III.D.3 of Appendix J to 10 CFR Part 50. Such action would not enhance the protection of the environment and would result in unjustified costs for the licensee.

Alternative Use Resources: This action does not involve the use of resources not considered previously in the Final Environmental Statement for Dresden, Units 2 and 3 dated November 1973.

Agencies and Persons Consulted: The NRC staff reviewed the licensee's request and did not consult other agencies or persons.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

Based upon the environmental assessment, the NRC staff concludes that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this proposed action, see the licensee's letter dated January 10, 1984. This letter is available for public inspection at the Commission's Public Document Room, 1717 H. Street, N.W., Washington, D.C. and at the Morris Public Library, 604 Liberty Street, Morris, Illinois 60451.

Dated at Rockville, Maryland this 26th day of February 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

(S)
Daniel R. Muller, Director
Project Directorate III-2
Division of Reactor Projects - III,
IV, V, and Special Projects

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