Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

August 7, 1998

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. MA1694)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 163 to Facility Operating License No. DPR-25 for Dresden, Unit 3. The amendment is in response to your application dated May 6, 1998.

The amendment revises Technical Specification (TS) 4.6.E to allow a one-time extension of the 40-month surveillance interval requirement to set pressure test or replace all main steam safety valves (MSSVs) to a maximum interval of 60 months as currently allowed by the American Society of Mechanical Engineers Boiler and Pressure Vessel Code.

The TS requirement that all MSSVs be set pressure tested or replaced each 40 months was added by the Dresden TS Upgrade Program (TSUP), in Amendment Nos. 150 and 145, dated June 28, 1996. Commonwealth Edison Company (ComEd) had an opportunity to complete this MSSV surveillance in the spring of 1997 during the Unit 3 refueling outage. The 40-month MSSV surveillance interval plus the 25 percent extension of TS 4.0.B would expire on August 13, 1998, if not extended once to a 60-month interval to allow plant operation to the next refueling outage. The staff considers that ComEd's implementation of the TSUP amendment and planning for the last Unit 3 refueling outage was deficient for not including this surveillance. These deficiencies indicate that improvements are needed at Dresden to ensure that surveillance schedules are updated to implement changes to TS surveillance requirements.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

ORIGINAL SIGNED BY:

Lawrence W. Rossbach, Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-249

Enclosures: 1. Amendment No. 163 to DPR-25
2. Safety Evaluation

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

August 7, 1998

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Docket No. 50-249

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cc w/encls: see next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 163
License No. DPR-25

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by the Commonwealth Edison Company (the licensee) dated May 6, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B. of Facility Operating License No. DPR-25 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 163 , are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Lawrence W. Rossbach, Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: August 7, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 163

FACILITY OPERATING LICENSE NO. DPR-25

DOCKET NO. 50-249

Revise the Appendix A Technical Specifications by removing the page identified below and inserting the attached page. The revised page is identified by the captioned amendment number and contains marginal lines indicating the area of change.

REMOVE	INSERT
3/4.6-7	3/4.6-7

3.6 - LIMITING CONDITIONS FOR OPERATION

E. Safety Valves

The safety valve function of the 9 reactor coolant system safety valves shall be OPERABLE in accordance with the specified code safety valve function lift settings[a] established as:

1 safety valve[b] @1135 psig ±1%
2 safety valves @1240 psig ±1%
2 safety valves @1250 psig ±1%
4 safety valves @1260 psig ±1%

APPLICABILITY:

OPERATIONAL MODE(s) 1, 2 and 3.

ACTION:

1. With the safety valve function of one or more of the above required safety valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

2. Deleted.

4.6 - SURVEILLANCE REQUIREMENTS

E. Safety Valves

1. Deleted.

2. At least once per 18 months, 1/2 of the safety valves shall be removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations. At least once per 40 months[c], the safety valves shall be rotated such that all 9 safety valves are removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations.

---

a The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

b Target Rock combination safety/relief valve.

c The surveillance interval has been extended to 60 months for Unit 3, Cycle 15 only, and the provisions of Specification 4.0.B are not applicable to the 60-month interval.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 163 TO FACILITY OPERATING LICENSE NO. DPR-25

COMMONWEALTH EDISON COMPANY

DRESDEN NUCLEAR POWER STATION, UNIT 3

DOCKET NO. 50-249

1.0 INTRODUCTION

By letter dated May 6, 1998, Commonwealth Edison Company (ComEd, the licensee) submitted a request for a one-time change to the Dresden Nuclear Power Station, Unit 3, Technical Specifications (TS) for the plant main steam safety valves (MSSVs). Specifically, the licensee requested that TS Surveillance Requirement (SR) 4.6.E.2 be revised such that the surveillance interval be extended from 40 months to 60 months for Unit 3, Cycle 15 only, and that the provisions of TS 4.0.B not be applicable to the 60-month interval. TS 4.0.B states that each surveillance interval shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the surveillance interval.

2.0 BACKGROUND

Dresden, Unit 3, has eight MSSVs (spring actuated) and one Target Rock (pilot actuated) safety and relief valve (SRV). The licensee complies with both the TS and the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) OM-1-1981 testing requirements by testing at least one-half (four of eight) of the MSSVs, or replacing them with valves which have been tested, every 18 months. The Target Rock SRV is categorized in its own ASME valve group and is tested every 18 months. The reason for the proposed one-time TS change is that MSSVs 3-203-4A, B, C, and D, currently in service at Dresden, Unit 3, were installed on June 13, 1994, and the TS 40-month surveillance interval, including the 25 percent extension per TS 4.0.B, expires on August 13, 1998. Therefore, the licensee proposes a one-time extension of the TS SR 4.6.E.2 surveillance interval from 40 months to 60 months (with no extension), to allow plant operation until the fifteenth refueling outage, scheduled for the end of January 1999.

3.0 BASIS FOR TECHNICAL SPECIFICATION CHANGE

In order to meet the above TS SR for the MSSVs, the plant must be shut down to Mode 4 to perform the necessary MSSV surveillance. Without performing the required MSSV surveillance and upon expiration of the surveillance interval, the plant would be required to enter TS 3.6.E, Action 1, since valves 3-203-4A, B, C, and D would be declared inoperable for failure to perform the surveillance within the required interval. It was possible for the licensee to have performed the necessary surveillance on these four MSSVs during a recently planned outage for replacing certain electrical equipment which began on May 2, 1998. However, the licensee stated that this would have resulted in additional risks and hardships, without a corresponding benefit to quality or safety. The licensee stated that the surveillance would have resulted in additional risk and

radiation dose to personnel performing the valve replacement. The licensee also stated that the Reactor Water Cleanup System would be out-of-service during this outage, and that the Main Steam Line Drains could not be used as an alternative drain path for the reactor coolant if the MSSVs were being removed. The licensee also stated that the replacement of MSSVs would result in an approximately 4-day extension to the outage and an associated loss of plant power generation.

In support of the proposed longer surveillance interval for the MSSVs, the licensee submitted setpoint test data for recent refueling outages at both Units 2 and 3. The data indicate that the last as-found data for valves 3-203-4A, B, C, and D, which are scheduled for replacement at the next refueling outage, were within the +/-1 percent TS tolerance limits (with one exception, which was only 3 psi above the +1 percent limit). Also, for valves 3-203-4E, F, G and H, which were installed for 65 months and then tested in May 1997, the as-found setpoints were within the +/-1 percent TS tolerance limits (with one exception, which was only 4 psi below the -1 percent limit). The licensee stated that all of these valves are subjected to the same maintenance procedures. Therefore, the licensee is confident that valves 3-203-4A, B, C, and D will have acceptable setpoint results after subsequent as-found testing.

4.0 EVALUATION

The staff has reviewed the licensee's proposed one-time TS change and agrees with the licensee that the current requirement to test the four MSSVs 3-203-3A, B, C, and D by August 13, 1998, would result in additional hardship and risk without a corresponding increase in quality or safety. Further, the staff agrees that, based on the as-found setpoint test data for the plant MSSVs, there is adequate assurance that the valves will perform adequately until the next refueling outage. Therefore, the staff finds the proposed one-time change to TS SR 4.6.E.2, which would allow the surveillance interval to be increased to 60 months with the provisions of TS 4.0.B not applicable, to be acceptable.

5.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendment. The State official had no comments.

6.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a surveillance requirement. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (63 FR 30263). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

7.0 CONCLUSION

Based on the above evaluation, the staff concludes that the licensee has demonstrated the adequacy of the proposed one-time change to the Dresden, Unit 3, TS. The proposed change provides for increasing the MSSV surveillance interval from 40 months to 60 months with the provisions of TS 4.0.B not applicable. Therefore, the proposed changes to TS SR 4.6.E.2 for Dresden, Unit 3, are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: G. Hammer

Date: August 7, 1998