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October 21, 1983

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Docket No. 50-237/249

Mr. Dennis L. Farrar
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Farrar:

SUBJECT: OPERABILITY REQUIREMENTS FOR ECCS RING HEADER SNUBBERS

Dresden Nuclear Power Station, Unit Nos. 2 and 3

The Commission has issued the enclosed Amendment No. 76 to Provisional Operating License No. DPR-19 and Amendment No. to Facility Operating License No. DPR-25 for the Dresden Nuclear Power Station, Units 2 and 3, respectively. The amendments consist of changes to the Technical Specifications in response to your application dated June 13, 1983.

The amendments authorize changes to the Technical Specifications to allow extended time limits for the inoperability of the ECCS ring header snubbers. Also, for Unit 3 only, Tables 3.6.1.a and 3.6.1.b are updated to reflect changes in the type of snubbers (mechanical or hydraulic) already installed.

A Notice of Consideration of Issuance of Amendment to License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on July 26, 1983 (48 FR 33948). No request for hearing was received and no comments were received.

A copy of our related Safety Evaluation is also enclosed. This action will appear in the Commission's Monthly Notice publication in the Federal Register.

Sincerely,

ORIGINAL SIGNED BY

Dennis M. Crutchfield Chief
Operating Reactors Branch #5
Division of Licensing

*Immediately before
expiration
Create for Petition
at Council
If any
Control held*

8310250188 831021
PDR ADOCK 05000237
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Enclosures:

1. Amendment No. to DPR-19
2. Amendment No. to DPR-25
3. Safety Evaluation

*SE01 1/1
DSU USE EX(16)*

OFFICE	cc w/enclosure	DL:ORB #5	DL:ORB #5	DL:ORB #5	OELD	DIS
SURNAME	See next page	RGilbertsjc	HSmith	DCrutchfield	DRepka	EMiraglia
DATE		10/15/83	10/15/83	10/15/83	10/17/83	10/17/83

Mr. Dennis L. Farrar

cc

Isham, Lincoln & Beale
Counselors at Law
One First National Plaza, 42nd Floor
Chicago, Illinois 60603

Mr. B. B. Stephenson
Plant Superintendent
Dresden Nuclear Power Station
Rural Route #1
Morris, Illinois 60450

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
RR #1
Morris, Illinois 60450

Chairman
Board of Supervisors of
Grundy County
Grundy County Courthouse
Morris, Illinois 60450

U. S. Environmental Protection Agency
Federal Activities Branch
Region V Office
ATTN: Regional Radiation Representative
230 South Dearborn Street
Chicago, Illinois 60604

James G. Keppler, Regional Administrator
Nuclear Regulatory Commission, Region III
799 Roosevelt Street
Glen Ellyn, Illinois 60137

Mr. Gary N. Wright, Manager
Nuclear Facility Safety
Illinois Department of Nuclear Safety
1035 Outer Park Drive, 5th Floor
Springfield, Illinois 62704



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

COMMONWEALTH EDISON COMPANY

Docket No. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 76
License No. DPR-19

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Commonwealth Edison Company (the licensee) dated June 13, 1983 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;
 - 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.

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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 Provisional Operating License No. DPR-19 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 76, 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.

FOR THE NUCLEAR REGULATORY COMMISSION


Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Attachment:

1. Changes to the Technical Specifications

Date of Issuance: October 21, 1983

ATTACHMENT TO LICENSE AMENDMENT NO.

PROVISIONAL OPERATING LICENSE NO. DPR-19

DOCKET NO. 50-237

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. These pages contain the captioned amendment number and a vertical line indicating the change.

Replace Pages

91b
91d-1
99b

3.6 LIMITING CONDITION FOR OPERATIONI. Snubbers (Shock Suppressors)

1. During all modes of operation except cold shutdown and refuel, all safety related snubbers limited in Table 3.6.1a and 3.6.1b shall be operable except as noted in Specification 3.6.1.2 through 3.6.1.4.

2. From and after the time a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced. Torus Ring Header snubbers may be inoperable in either of the following configurations until 1983, to facilitate the installation of the Mark I torus attached piping modification.

Configuration A: Every other existing snubber pair (up to 3 pairs) on the ECCS header, or

Configuration B: One existing snubber from each of the 6 existing snubber pairs on the ECCS header.

3. If the requirements of 3.6.I.1 and 3.6.I.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in cold shutdown or refuel condition within 36 hours.

4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup. This requirement does not apply to Torus Ring Header snubbers for the period identified in paragraph 3.6.I.2 above.

5. Snubbers may be added to safety related systems without prior license amendment to Tables 3.6.1a and/or 3.6.1b provided that a revision to Tables 3.6.1a and/or 3.6.1b is included with the next license amendment request.

Unit 2 Amendment No. 70, 76
Unit 3 Amendment No. 41, 62, 67

4.6 SURVEILLANCE REQUIREMENTI. Snubbers (Shock Suppressors)

The following surveillance requirements apply to all safety related snubbers listed in Tables 3.6.1a and 3.6.1b.

1. Visual Inspection

An independent visual inspection shall be performed on the safety related hydraulic and mechanical snubbers contained in Tables 3.6.1a and 3.6.1b in accordance with the below schedule.

- a. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability.
- b. All mechanical snubbers shall be visually inspected. This inspection shall consist of, but not necessarily be limited to, inspection of the snubber and attachments to the piping and anchor for indications of damage or impaired operability.

No. of Snubbers Found
Inoperable During
Inspection Interval

Next Required
Inspection Interval

0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3, 4	124 days ± 25%
5, 6, 7	62 days ± 25%
≥8	31 days ± 25%

TABLE 3.6.1a

SAFETY RELATED HYDRAULIC SNUBBERS*

DPR-19

Note 1. These snubbers are being replaced with mechanical snubbers as delineated in Section 3.6.1.2 and a revised table will be issued upon completion of the Mark I Torus attached piping modification.

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
2	Torus Ring Header 1501-24" (Note 1)	483'	83°			X
3	Torus Ring Header 1501-24" (Note 1)	483'	74°			X
4	Torus Ring Header 1501-24" (Note 1)	483'	38°			X
5	Torus Ring Header 1501-24" (Note 1)	483'	29°			X
7	Torus Ring Header 1501-24" (Note 1)	483'	331°			X
8	Torus Ring Header 1501-24" (Note 1)	483'	322°			X
9	Torus Ring Header 1501-24" (Note 1)	483'	286°			X
10	Torus Ring Header 1501-24" (Note 1)	483'	277°			X
12	Torus Ring Header 1501-24" (Note 1)	483'	218°			X
13	Torus Ring Header 1501-24" (Note 1)	483'	209°			X
15	Torus Ring Header 1501-24" (Note 1)	483'	151°			X
16	Torus Ring Header 1501-24" (Note 1)	483'	142°			X

*Modifications to this table due to changes in high radiation should be submitted to the NRC as part of the next license amendment request.

91d-1

The inspection frequency is based upon maintaining a constant level of snubber protection. Thus, the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original require time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To further increase the assurance of snubber reliability, functional tests will be performed once each refueling cycle. A representative sample of 10% of the safety-related snubbers will be functionally tested. Observed failures on these samples will require testing of additional units.

Hydraulic snubbers and mechanical snubbers may each be treated as different entities for the above surveillance programs.

Hydraulic snubber testing will include stroking of the snubbers to verify piston movement, lock-up, and bleed. Functional testing of the mechanical snubbers will consist of verification that the force that initiates free movement of the snubber in either tension or compression is less than the maximum breakaway friction force. The remaining portion of the functional test consisting of verification that the activation (restraining action) is achieved within the specified range of acceleration in both tension and compression will not be done. This is due to the lack of competitive marketable test fixtures available for station use. Therefore, until such time as test fixtures become available, only part (i) of the test will be performed; part (ii) will not be done.

Unit 2-Amendment No. ~~70~~, 76

Unit 3-Amendment Nos. ~~22, 23~~, 67

When the cause of rejection of the snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

Monitoring of snubber service life shall consist of the existing station record systems, including the central filing system, maintenance files, safety-related work packages, and snubber inspection records. The record retention programs employed at the station shall allow station personnel to maintain snubber integrity. The service life for hydraulic snubbers is 10 years. The hydraulic snubbers existing locations do not impose undue safety implications on the piping and components because they are not exposed to excesses in environmental conditions. The service life for mechanical snubbers is 40 years, lifetime of the plant. The mechanical snubbers are installed in areas of harsh environmental conditions because of their dependability over hydraulic snubbers in these areas. All snubber installations have been thoroughly engineered providing the necessary safety requirements. Evaluations of all snubber locations and environmental conditions justify the above conservative snubber service lives.

A re-analysis of the ring header design based upon acceleration response spectra derived from the original suction header analysis report demonstrates that for normal operation, plus seismic, neither the header nor the torus penetrations are over-stressed with all snubbers inoperable. The limitation of a maximum of 3 pairs or 1 snubber from each pair inoperable out of 6 pairs is considered conservative. Since the analysis shows that the plant can operate safely indefinitely with no snubbers on the ring header the limitation on operation and startup with inoperable snubbers until 1983 is justified. This time frame is adequate to allow completion of the Mark I torus attached piping modification.



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

COMMONWEALTH EDISON COMPANY

Docket No. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 67
License No. DPR-25

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Commonwealth Edison Company (the licensee) dated June 13, 1983 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;
 - 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. 67, 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.

FOR THE NUCLEAR REGULATORY COMMISSION


Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Attachment:

1. Changes to the Technical Specifications

Date of Issuance: October 21, 1983

ATTACHMENT TO LICENSE AMENDMENT NO.

FACILITY OPERATING LICENSE NO. DPR-25

DOCKET NO. 50-249

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. These revised pages contain the captioned amendment number and a vertical line indicating the change.

Replace Pages

- 91b
- 91d-1
- 91e-1
- 91e-2
- 99b

3.6 LIMITING CONDITION FOR OPERATION

I. Snubbers (Shock Suppressors)

1. During all modes of operation except cold shutdown and refuel, all safety related snubbers limited in Table 3.6.1a and 3.6.1b shall be operable except as noted in Specification 3.6.1.2 through 3.6.1.4.

2. From and after the time a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced. Torus Ring Header snubbers may be inoperable in either of the following configurations until 1983, to facilitate the installation of the Mark I torus attached piping modification.

Configuration A: Every other existing snubber pair (up to 3 pairs) on the ECCS header, or

Configuration B: One existing snubber from each of the 6 existing snubber pairs on the ECCS header.

3. If the requirements of 3.6.1.1 and 3.6.1.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in cold shutdown or refuel condition within 36 hours.

4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup. This requirement does not apply to Torus Ring Header snubbers for the period identified in paragraph 3.6.1.2 above.

5. Snubbers may be added to safety related systems without prior license amendment to Tables 3.6.1a and/or 3.6.1b provided that a revision to Tables 3.6.1a and/or 3.6.1b is included with the next license amendment request.

4.6 SURVEILLANCE REQUIREMENTS

I. Snubbers (Shock Suppressors)

The following surveillance requirements apply to all safety related snubbers listed in Tables 3.6.1a and 3.6.1b.

1. Visual Inspection

An independent visual inspection shall be performed on the safety related hydraulic and mechanical snubbers contained in Tables 3.6.1a and 3.6.1b in accordance with the below schedule.

a. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability.

b. All mechanical snubbers shall be visually inspected. This inspection shall consist of, but not necessarily be limited to, inspection of the snubber and attachments to the piping and anchor for indications of damage or impaired operability.

No. of Snubbers Found Inoperable During Inspection Interval

Next Required Inspection Interval

0	18 months ± 25%
1	12 months ± 25%
2	6 months ± 25%
3, 4	124 days ± 25%
5, 6, 7	62 days ± 25%
≥ 8	31 days ± 25%

Note 1. These snubbers are being replaced with mechanical snubbers as delineated in Section 3.6.I.2 and a revised table will be issued upon completion of the Mark I Torus attached piping modification.

Table 3.6.1.a

SAFETY RELATED HYDRAULIC SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
2	Torus Ring Header 1501-24" (Note 1)	483'	83°			X
3	Torus Ring Header 1501-24" (Note 1)	483'	74°			X
4	Torus Ring Header 1501-24" (Note 1)	483'	38°			X
5	Torus Ring Header 1501-24" (Note 1)	483'	29°			X
7	Torus Ring Header 1501-24" (Note 1)	483'	331°			X
8	Torus Ring Header 1501-24" (Note 1)	483'	286°			X
9	Torus Ring Header 1501-24" (Note 1)	483'	286°			X
10	Torus Ring Header 1501-24" (Note 1)	483'	227°			X
12	Torus Ring Header 1501-24" (Note 1)	483'	209°			X
13	Torus Ring Header 1501-24" (Note 1)	483'	209°			X
15	Torus Ring Header 1501-24" (Note 1)	483'	151°			X
Isolation Condenser Pipeway Room:						
1	Isolation Condenser Line 1303-12"	558'	180°	X		X
2	Isolation Condenser Line 1303-12"	568'	180°	X		X
3	Isolation Condenser Line 1303-14"	580'	195°	X		X
Drywell:						
23	Drywell Cleanup Line 1201-8"	537'6"	84°	X	X	

* Modifications to this table, due to changes in high radiation, should be submitted to the NRC as part of next license amendment request.

Table 3.6.1.b

SAFETY RELATED MECHANICAL SNUBBERS*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
1	Drywell Recirc. Motor 3B-202	524'	328°	X	X	
2	Drywell Recirc. Motor 3B-202	524'	302°	X	X	
3	Drywell Recirc. Motor 3B-202	524'	315°	X	X	
4	Drywell Recirc. Motor 3A-202	524'	148°	X	X	
5	Drywell Recirc. Motor 3A-202	524'	122°	X	X	
6	Drywell Recirc. Motor 3A-202	524'	135°	X	X	
7	Drywell Recirc. Pump 3B-202	512'	326°	X	X	
8	Drywell Recirc. Pump 3B-202	512'	304°	X	X	
9	Drywell Recirc. Pump 3B-202	507'	315°	X	X	
10	Drywell Recirc. Pump 3A-202	512'	124°	X	X	
11	Drywell Recirc. Pump 3A-202	512'	146°	X	X	
12	Drywell Recirc. Pump 3A-202	507'	135°	X	X	
15	Drywell LPCI Line 1506-16"	513'	256°	X	X	
16	Drywell LPCI Line 1519-16"	513'	95°	X	X	
21	Drywell Recirc. Header 201A-22"	533'6"	22°	X	X	
22	Drywell HPCI Line 2305-10"	550'	121°	X	X	
25	Drywell Cleanup Line 1201-8"	537'6"	78°	X	X	
27	Drywell Cleanup Line 1201-8"	538'6"	60°	X	X	
29	Drywell Core Spray Line 1404-10"	573'	231°	X	X	
30	Drywell Core Spray Line 1403-10"	561'	336°	X	X	
31	Drywell HPCI Line 2305-10"	563'	140°	X	X	

* Modifications to this table, due to changes in high radiation, should be submitted to the NRC as part of next license amendment request.

Table 3.6.1.b (Continued)

SAFETY RELATED MECHANICAL SNUBBER*

SNUBBER NO.	LOCATION	ELEVATION	AZIMUTH	SNUBBER IN HIGH RADIATION AREA DURING SHUTDOWN	SNUBBERS INACCESSIBLE DURING NORMAL OPERATION	SNUBBERS ACCESSIBLE DURING NORMAL OPERATION
32	Drywell Target Rock Valve 203-3A	542'6"	14°	X	X	
33	Drywell Target Rock Valve 203-3A	542'2"	31°	X	X	
34	Drywell Target Rock Valve 203-3A	540'	19°	X	X	
35	Drywell Target Rock Valve 203-3A	540'6"	34°	X	X	
36	Drywell Recirc. Line 3-201B-22"	532'6"	183°	X	X	
37	Drywell Feedwater Line 3-3204D-12"	537'	110°	X	X	
38	Drywell Feedwater Line 3-3204E-12"	538'6"	260°	X	X	
41	Drywell Main Steam Line 3-3001B-20"	534'9"	28°	X	X	
42	Drywell Main Steam Line 3-3001A-20"	534'8"	14°	X	X	
43	Drywell Main Steam Line 3-3001C-20"	534'8"	332°	X	X	
44	Drywell Main Steam Line 3-3001B-20"	542'8"	112°	X	X	
45	Drywell Main Steam Line 3-3001B-20"	543'6"	100°	X	X	
46	Drywell Main Steam Line 3-3001A-20"	543'6"	75°	X	X	
47	Drywell Main Steam Line 3-3001A-20"	544'1"	75°	X	X	
48	Drywell Main Steam Line 3-3001D-20"	542'8"	285°	X	X	
49	Drywell Main Steam Line 3-3001-D-20"	543'6"	285°	X	X	
50	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	
51	Drywell Main Steam Line 3-3001C-20"	543'6"	255°	X	X	
	Torus					
16	Torus Ring Header 1501-24"	483'	142°			X

The inspection frequency is based upon maintaining a constant level of snubber protection. Thus, the required inspection interval varies inversely with the observed snubber failures. The number of inoperable snubbers found during a required inspection determines the time interval for the next required inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original require time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

To further increase the assurance of snubber reliability, functional tests will be performed once each refueling cycle. A representative sample of 10% of the safety-related snubbers will be functionally tested. Observed failures on these samples will require testing of additional units.

Hydraulic snubbers and mechanical snubbers may each be treated as different entities for the above surveillance programs.

Hydraulic snubber testing will include stroking of the snubbers to verify piston movement, lock-up, and bleed. Functional testing of the mechanical snubbers will consist of verification that the force that initiates free movement of the snubber in either tension or compression is less than the maximum breakaway friction force. The remaining portion of the functional test consisting of verification that the activation (restraining action) is achieved within the specified range of acceleration in both tension and compression will not be done. This is due to the lack of competitive marketable test fixtures available for station use. Therefore, until such time as test fixtures become available, only part (i) of the test will be performed; part (ii) will not be done.

Unit 2-Amendment No. 70, 76

Unit 3-Amendment Nos. 22, 22, 67

When the cause of rejection of the snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

Monitoring of snubber service life shall consist of the existing station record systems, including the central filing system, maintenance files, safety-related work packages, and snubber inspection records. The record retention programs employed at the station shall allow station personnel to maintain snubber integrity. The service life for hydraulic snubbers is 10 years. The hydraulic snubbers existing locations do not impose undue safety implications on the piping and components because they are not exposed to excesses in environmental conditions. The service life for mechanical snubbers is 40 years, lifetime of the plant. The mechanical snubbers are installed in areas of harsh environmental conditions because of their dependability over hydraulic snubbers in these areas. All snubber installations have been thoroughly engineered providing the necessary safety requirements. Evaluations of all snubber locations and environmental conditions justify the above conservative snubber service lives.

A re-analysis of the ring header design based upon acceleration response spectra derived from the original suction header analysis report demonstrates that for normal operation plus seismic, neither the header nor the torus penetrations are over-stressed with all snubbers inoperable. The limitation of a maximum of 3 pairs or 1 snubber from each pair inoperable out of 6 pairs is considered conservative. Since the analysis shows that the plant can operate safely indefinitely with no snubbers on the ring header the limitation on operation and startup with inoperable snubbers until 1983 is justified. This time frame is adequate to allow completion of the Mark I torus attached piping modification.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 76 TO PROVISIONAL OPERATING LICENSE NO. DPR-19
AND AMENDMENT NO. 67 TO FACILITY OPERATING LICENSE NO. DPR-25
COMMONWEALTH EDISON COMPANY
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

On June 13, 1983, Commonwealth Edison Company (CECo) proposed amendments to Appendix A of Operating Licenses DPR-19 and DPR-25. The proposal requested extended time limits for the inoperability of the ECCS ring header snubbers. The period of inoperability of the snubbers for Dresden Unit 2 was requested to be ninety days after the amendment issuance and for Unit 3 the period would extend to December 30, 1983 or ninety days after the amendment issuance, whichever is later. In addition, the proposal updated, for Dresden Unit 3 only, Tables 3.6.1a and 3.6.1b to reflect changes in the type of snubbers (mechanical or hydraulic) already installed.

A Notice of Consideration of Issuance of Amendment to Licenses and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing related to the requested action was published in the Federal Register on July 26, 1983 (48 FR 33948). No request for hearing was received and no comments were received.

2.0 EVALUATION

There are six pairs of snubbers attached to the torus ring header in both Dresden Station Units. Amendments 47 and 41 to the Technical Specifications for Units 2 and 3, respectively, were approved by the staff on February 1, 1980. These amendments permitted either every other pair of snubbers (up to three pairs) or one snubber in each of the six pairs of snubbers to remain inoperable at the same time until September 1, 1980. The amendments also permitted reactor startup with snubbers inoperable as previously described during the same time period. These amendments were requested to enable both plants to perform the construction work to change the existing 20 kip hydraulic snubbers to 35 kip mechanical snubbers. However, the proposed modifications have not yet been completed.

Amendments 47 and 41 were originally approved because analysis indicated that stresses in the torus ring header are below code allowables under

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normal operating loadings plus operating basis earthquake (OBE) or safe shutdown earthquake (SSE) without snubber protection. The above mentioned analysis is still valid and the staff concludes that the proposed amendments should be approved so that the modification work can be completed.

The staff also finds acceptable the proposed updating of Tables 3.6.1a and 3.6.1b in the Dresden Unit 3 Technical Specifications so that changes already made in the type of snubbers installed can be properly documented.

3.0 ENVIRONMENTAL CONSIDERATION

The staff has determined that the amendments do not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, the staff further concludes that the amendments involve an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR 51.5(d)(4), that an environmental impact statement, or negative declaration and environmental impact appraisal, need not be prepared in connection with the issuance of these amendments.

4.0 CONCLUSION

The staff 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; and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of these amendments will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ACKNOWLEDGEMENTS

The following staff members contributed to this evaluation:

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Dated: October 21, 1983