

November 7, 1994

Mr. D. L. Farrar  
Manager, Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III, Suite 500  
1400 OPUS Place  
Downers Grove, IL 60515

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNIT 2 - ENVIRONMENTAL ASSESSMENT  
AND FINDING OF NO SIGNIFICANT IMPACT - SCHEDULAR EXEMPTION FROM  
10 CFR PART 50, APPENDIX J (TAC NO. M90723)

Dear Mr. Farrar:

Enclosed for your information is a copy of an "Environmental Assessment and Finding of No Significant Impact." The Environmental Assessment relates to your request dated October 28, 1994, that requested a one time schedular exemption for Dresden, Unit 2, from the required test interval for a Type A test required by 10 CFR Part 50, Appendix J, Section III.A.6.(b). The exemption was requested to increase the surveillance interval to a maximum of 242 days longer than that permitted by the regulations for an integrated leak rate test which can not be performed during power operation. The exemption will avoid a plant shutdown to perform the Type A test required by the regulations.

The Environmental Assessment has been sent to the Office of the Federal Register for publication.

Sincerely,

Original Signed By:

John F. Stang, Senior Project Manager  
Project Directorate - III/2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-237

Enclosure: As stated

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Mr. D. L. Farrar  
Commonwealth Edison Company

Dresden Nuclear Power Station  
Unit Nos. 2 and 3

cc:

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U.S. Nuclear Regulatory Commission  
Resident Inspectors Office  
Dresden Station  
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Morris, Illinois 60450-9766

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Office of Nuclear Facility Safety  
1035 Outer Park Drive  
Springfield, Illinois 62704

Chairman  
Grundy County Board  
Administration Building  
1320 Union Street  
Morris, Illinois 60450

UNITED STATES NUCLEAR REGULATORY COMMISSION

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-237

ENVIRONMENTAL ASSESSMENT AND FINDING OF

NO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of a scheduler exemption from the requirement of 10 CFR Part 50, Appendix J, to Facility Operating License No. DPR-19, issued to Commonwealth Edison Company, (ComEd the licensee), for operation of the Dresden Nuclear Power Station, Unit 2, located in Grundy County, Illinois.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action

The proposed action would grant a scheduler exemption from the requirements of Section III.A.6.(b) (Type A test) of Appendix J to 10 CFR Part 50 relating to the primary reactor containment leakage testing for water cooled reactors. The purpose of the test is to assure that leakage through the primary reactor containment shall not exceed allowable leakage rate values as specified in the Technical Specifications (TS) and that periodic surveillance is performed.

The proposed action is in accordance with the licensee's request for an exemption dated October 28, 1994.

Need for the Proposed Action

The licensee requested, pursuant to 10 CFR 50.12(a), a one-time scheduler exemption for Dresden, Unit 2, from the integrated leak rate test (ILRT) intervals for the Type A leak rate test required by 10 CFR Part 50, Appendix J, Section III.A.6.(b). The exemption is requested to avoid the

potential for a reactor shutdown. If a forced outage is imposed to perform testing, it would present undue hardship and cost in the form of increased radiological exposure. Furthermore, if a forced outage is imposed to perform the required testing, an additional plant shutdown and startup will be required. ComEd has had to reschedule the Dresden, Unit 2, refueling outage from September 1994 to July 1995, because of two forced maintenance outages. Increasing the interval between refueling outages will cause Dresden, Unit 2, to exceed the Type A leak rate testing surveillance interval required for the Type A leak rate test which can not be performed during reactor operation.

#### Environmental Impacts of the Proposed Action

The proposed action includes an exemption from performing the Type A test for a maximum period of 242 days beyond the required Appendix J test interval. As stated in 10 CFR Part 50, Appendix J, the purpose of the primary containment leak rate testing requirements is to ensure that leakage rates are maintained within the TS requirements and to assure that proper maintenance and repairs are performed throughout the service life of the containment boundary components. The requested exemption is consistent with the intent of 10 CFR 50.12(a), in that it represents a one-time only schedular extension of short duration. The required leak tests will still be performed to assess compliance with TS requirements, albeit later, and to assure that any required maintenance or repair is performed. As noted in Section III.A.6.(b) of Appendix J, it was intended that the testing be performed during refueling outages or other convenient intervals. Extending the Appendix J 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 occurrence during the 242 day extended period. In order to provide an added margin of safety and to account for possible increases in the leakage rates of untested volumes during the relatively short period of the exemption, Dresden Unit 2 will impose an administrative limit for minimum pathway leakage of 85 percent of 0.75La for the remaining Unit 2 fuel cycle. Past Unit 2 local leak rate test data have, in general, demonstrated good leak rate test results. The two consecutive Type A ILRT failures that have placed Unit 2 on the accelerated test schedule were the result of the addition of Type B and C test results to the Type A leakage and not problems with the Type A test boundaries. The containment leakage rate minus the Type B and C leakages for the last two Type A test failures during D2R12 and D2R13 were 285.50 standard cubic feet per hour (scfh) and 302.62 scfh, respectively. These values are 47 percent and 50 percent of the Type A ILRT acceptance criteria of 610.56 scfh (.75La). The above data, along with the station imposed limit for minimum pathway leakage, provide a basis for showing that the probability of exceeding the off site dose rates established in 10 CFR Part 100, will not be increased by extending the current Type A testing interval for a maximum of 242 days. The proposed exemption does not affect plant nonradiological effluents and has no other environmental impact. Therefore, the Commission concludes there are no measurable 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.A.6.(b) 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.

#### Alternate Use of Resources

This action does not involve the use of any resources not considered previously in the Final Environmental Statements for Dresden, Units 2 and 3, dated November 1973.

#### Agencies and Persons Consulted

The staff consulted with the Illinois State official regarding the environmental impact of the proposed action. The State official had no comments.

#### FINDING OF NO SIGNIFICANT IMPACT

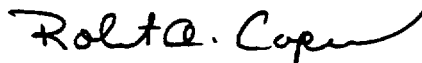
Based upon the foregoing environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed exemption.

For further details with respect to this action, see the licensee's request for exemption dated October 28, 1994, which is available for public inspection at the Commission's Public Document Room, The Gelman Building,

2120 L Street, NW., Washington, D.C., and at the local public document room located at the Morris Public Library, 604 Liberty Street, Morris, Illinois 60451.

Dated at Rockville, Maryland, this 4th day of November 1994.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Capra, Director  
Project Directorate III/2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation





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

November 7, 1994

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50-237, 50-247

MEMORANDUM FOR:

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Division of Freedom of Information and Publications Services  
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Office of Nuclear Reactor Regulation

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COMMONWEALTH EDISON COMPANY - Dresden, Units 2 and 3

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- ☐ Issuance of Final Director's Decision Under 10 CFR 2.206.
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Robert A. Capra, Director  
Project Directorate III-2

Enclosure:  
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Contact: John F. Stang  
Phone: 504-1345

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