

April 29, 2003

Mr. John L. Skolds, President  
Exelon Nuclear  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING INSERVICE INSPECTION  
PROGRAM RELIEF REQUEST I4R-02 (TAC NOS. MB7562 AND MB7563)

Dear Mr. Skolds:

By letter dated September 6, 2003, Exelon Generation Company submitted relief request I4R-02 concerning the risk-informed inservice inspection program at Dresden Nuclear Power Station, Units 2 and 3. The staff has identified additional information that is needed in order to complete their review of this relief request in the area of risk assessment. These questions were discussed with members of your staff on April 25, 2003. Your staff agreed to respond to this request for additional information (RAI) within thirty days of the date of this letter.

Should your staff have any questions about this request for additional information (RAI), please contact me at (301) 415-2863.

Sincerely,

*/RA/*

Lawrence W. Rossbach, Project Manager, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure: Request for Additional Information

cc w/encl: See next page

April 29, 2003

Mr. John L. Skolds, President  
Exelon Nuclear  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING INSERVICE INSPECTION  
PROGRAM RELIEF REQUEST I4R-02 (TAC NOS. MB7562 AND MB7563)

Dear Mr. Skolds:

By letter dated September 6, 2003, Exelon Generation Company submitted relief request I4R-02 concerning the risk-informed inservice inspection program at Dresden Nuclear Power Station, Units 2 and 3. The staff has identified additional information that is needed in order to complete their review of this relief request in the area of risk assessment. These questions were discussed with members of your staff on April 25, 2003. Your staff agreed to respond to this request for additional information (RAI) within thirty days of the date of this letter.

Should your staff have any questions about this request for additional information (RAI), please contact me at (301) 415-2863.

Sincerely,

*/RA/*

Lawrence W. Rossbach, Project Manager, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure: Request for Additional Information

cc w/encl: See next page

Distribution:

PUBLIC	PDIII/2 r/f	A. Mendiola	P. Coates
L. Rossbach	OGC	ACRS	S. Dinsmore
G. Georgiev	M. Ring, RIII		

**ADAMS Accession Number:** ML031180006

OFFICE	PM:PD3-2	LA:PD3-2	SC:PD3-2
NAME	LRossbach	PCoates	AMendiola
DATE	04/28/03	04/28/03	04/29/03

**OFFICIAL RECORD COPY**

Dresden Nuclear Power Units 2 and 3

cc:

Site Vice President - Dresden Nuclear Power Station  
Exelon Generation Company, LLC  
6500 N. Dresden Road  
Morris, IL 60450-9765

Dresden Nuclear Power Station Plant Manager  
Exelon Generation Company, LLC  
6500 N. Dresden Road  
Morris, IL 60450-9765

Regulatory Assurance Manager - Dresden  
Exelon Generation Company, LLC  
6500 N. Dresden Road  
Morris, IL 60450-9765

U.S. Nuclear Regulatory Commission  
Dresden Resident Inspectors Office  
6500 N. Dresden Road  
Morris, IL 60450-9766

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

Regional Administrator  
U.S. NRC, Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

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

Document Control Desk-Licensing  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Senior Vice President, Nuclear Services  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Vice President  
Mid-West Regional Operating Group

Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Senior Vice President  
Mid-West Regional Operating Group  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Vice President - Licensing and Regulatory  
Affairs  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Director - Licensing  
Mid-West Regional Operating Group  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Senior Counsel, Nuclear  
Mid-West Regional Operating Group  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Manager Licensing - Dresden and  
Quad Cities  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

**Dresden Nuclear Power Station, Units 2 and 3**  
**Request for Additional Information on 4<sup>th</sup> 10-Year Interval Risk Relief Request I4R-02**  
**TAC Nos. MB7562 And MB7563**

1. Have any welds that were selected for inspection in the Risk-Informed Inservice Inspection (RI-ISI) program that was approved by the staff in Reference 1 been removed from the population of welds that will be inspected during the fourth ten-year interval? If so, why was [were] the weld[s] removed from the population of welds to be inspected?
2. Have any welds that were not selected for inspection in the RI-ISI program that was approved by the staff in Reference 1 been selected for inspection during the fourth ten-year interval? If so, why was [were] the weld[s] added to the population of welds to be inspected?
3. The relief request includes the following paragraph:

“The Risk Impact Assessment completed as part of the original baseline RI-ISI Program was an implementation/transition check on the initial impact of converting from a traditional ASME Section XI program to the new RI-ISI methodology. For the Fourth Interval ISI update, there is no transition occurring between two different methodologies, but rather, the currently approved RI-ISI methodology and evaluation will be maintained for the new interval. As such, the initial screening of the risk impact assessment is not a part of the living program process and is not required to be continually updated.”

The staff does not concur with the implication that, if there is no change in methodology, the change in risk assessment is not part of the living process. RG 1.178, SRP 3.9.8, and the EPRI Topical report (Refs. 2, 3, and 4) require an evaluation of the change in risk arising from the proposed change in the ISI program. Please provide a discussion on the potential change in risk between the RI-ISI program proposed for implementation in the fourth interval and the ASME Section XI requirements from which relief was granted in Reference 1. If inspections were discontinued or relocated between the third and the fourth intervals' RI-ISI programs, please provide an estimate of the change in risk.

References:

- 1) Letter from A. J. Mendiola (USNRC) to O. D. Kingsley (Exelon) transmitting “Safety Evaluation of Third Interval Risk-Informed Inservice Inspection Program Relief Request,” September 5, 2001.
- 2) U.S. Nuclear Regulatory Commission, *An Approach for Plant-Specific Risk-Informed Decision Making: Inservice Inspection of Piping*, Regulatory Guide 1.178, September 1998.
- 3) U.S. Nuclear Regulatory Commission, *Standard Review Plan for Trial Use for the Review of Risk-Informed Inservice Inspection of Piping*, NUREG-0800, SRP Chapter 3.9.8, May 1998.
- 4) Electric Power Research Institute, *Revised Risk-Informed Inservice Inspection Evaluation Procedure*, EPRI TR-112657, Revision B-A, January 2000.