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U. S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, DC 20555-0001

Dresden Nuclear Power Station, Units 2 and 3  
Facility Operating License Nos. DPR-19 and DPR-25  
Docket Nos. 50-237 and 50-249

Subject: Delay in Completion of Unresolved Safety Issue (USI) A-46 Commitment

Reference: Letter from R. J. Hovey (EGC) to U. S. NRC, "Delay in Completion of Unresolved Safety Issue (USI) A-46 Commitment," dated July 17, 2003

In the referenced letter, Exelon Generation Company, LLC (EGC) notified the NRC of a delay in completing actions related to USI A-46, "Seismic Qualification of Equipment in Operating Plants," for Dresden Nuclear Power Station (DNPS), Unit 3. In part, the referenced letter identified six work orders that remain open associated with DNPS Unit 3 outliers, which were incorrectly scheduled to be completed by the end of the October 2003 Unit 2 refueling outage due to a misunderstanding of the original commitment. EGC committed to complete these remaining six work orders by the end of the Unit 2 refueling outage. However, upon further review, it has been determined that one of the work orders (i.e., the work order associated with Automatic Depressurization System (ADS) auto blowdown relay replacement), could not be done safely online and the associated commitment completion date must be changed.

The ADS auto blowdown relay replacement modification was planned as online work when it was issued. However, during a final walkdown DNPS personnel identified replacement of these relays would require removing three internal panel stiffeners that are blocking three of the five relays. Given this configuration of the panel, removal of the panel stiffeners and replacement of the relays online could easily cause an inadvertent ADS actuation and therefore would be imprudent. Other alternatives such as qualifying the existing relays with further evaluation were considered but determined not to be feasible.

Therefore, the auto blowdown relay replacement will be completed during the next Unit 3 refueling outage, D3R18, currently scheduled for fall 2004.

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All the remaining Unit 2 USI A-46 outlier resolution work was completed within the commitment dates (i.e. during the current Unit 2 refueling outage).

Should you have any questions concerning this letter, please contact Mr. Jeff Hansen, Regulatory Assurance Manager, at (815) 416 - 2800.

Respectfully,

A handwritten signature in black ink, appearing to read 'R. J. Hovey', with a horizontal line extending to the right from the end of the signature.

R. J. Hovey  
Site Vice President  
Dresden Nuclear Power Station

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector - Dresden Nuclear Power Station