

RS-04-111

July 23, 2004

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

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

Subject: Additional Information Regarding Request for Technical Specifications Changes  
Related to Main Steam Safety Valve Operability Requirements

- References:
1. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Request for Technical Specifications Changes Related to Main Steam Safety Valve Operability Requirements," dated October 10, 2002
  2. Letter from M. Banerjee (U. S. NRC) to C. M. Crane (Exelon Generation Company, LLC), "Dresden Nuclear Power Station, Units 2 and 3 – Request for Amendments – Technical Specification Changes Related to Main Steam Safety Valve Operability Requirements (TAC Nos. MB6537 and MB6538)," dated June 25, 2004

In Reference 1, Exelon Generation Company, LLC (EGC) requested changes to the Technical Specifications of Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station (DNPS), Units 2 and 3. The proposed changes increase the number of main steam safety valves (MSSVs) that are required to be operable from eight to nine.

In Reference 2, the NRC requested, in part, that EGC submit a license amendment request that revises the Technical Specification safety valve and safety/relief valve tolerances from  $\pm 1$  percent to values that are consistent with or bound actual valve performance. During a telephone call between the NRC and EGC on July 20, 2004, the schedule for completing the actions associated with revising the Technical Specification tolerances was discussed. EGC understands that the NRC plans to condition the license by requiring the following items for both DNPS Units 2 and 3.

3. The license amendment is effective as of the date of its issuance, and shall be implemented within 30 days.
4. Exelon shall submit values for the safety valve and safety/relief valve setpoint tolerances based on an uncertainty treatment methodology applied to the main steam safety valve and safety/relief valve setpoint test data by October 29, 2004.
5. Regarding the issue of the main steam safety valve and safety/relief valve test data potentially exceeding the current Technical Specification SR 3.4.3.1 allowed tolerance limit, Exelon shall submit a Technical Specification amendment request to change this

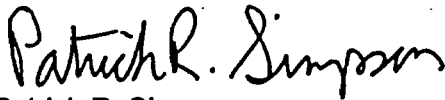
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tolerance value to one derived from item 4 above, if necessary, and the results of revisions to all applicable design basis analyses, within 6 months of NRC approval of item 4.

6. If regulatory approval of the tolerance uncertainty treatment methodology or the Technical Specification amendment application described above cannot be obtained, Exelon will operate Dresden Units 2 and 3 such that the Technical Specification dome pressure criterion of 1345 psig and the ASME overpressure criterion of 1375 psig are met with the respective main steam safety valve and safety/relief valve setpoint tolerances contained in the July 8, 2004, Exelon submittal.

Should you have any questions concerning this letter, please contact Mr. Kenneth M. Nicely, at (630) 657-2803.

Respectfully,



Patrick R. Simpson  
Manager – Licensing

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Dresden Nuclear Power Station  
Illinois Emergency Management Agency – Division of Nuclear Safety