Exelon Generation Company, LLC
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, IL 60450-9765

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Exelon Nuclear

March 7, 2005

SVPLTR #05-0007

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

Dresden Nuclear Power Station, Unit 3
Facility Operating License No. DPR-25
NRC Docket No. 50-249

Subject: Owner's Activity Report Submittal
Fourth 10-Year Interval 2004 Refueling Outage Activities

This letter submits the Owner's Activity Report (i.e., Form OAR-1) and Invessel Visual Inspection (IVVI) Report for the Dresden Nuclear Power Station (DNPS) Unit 3 refueling outage (D3R18) which began on October 26, 2004, and was completed on December 7, 2004. This is the first refueling outage conducted in the first inspection period of the fourth 10-year inservice inspection interval for DNPS Unit 3. A copy of the Owner's Activity Report and IVVI Report are provided as attachments to this letter.

This Owner's Activity Report is submitted in accordance with American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code Case N-532-1, "Alternate Requirements to Repair and Replacement Documentation Requirements and Inservice Summary Report Preparation and Submission," and Regulatory Guide 1.147, "Inservice Inspection Code Case Acceptability, ASME Section XI, Division 1," Revision 13. Code Case N-532-1 requires an Owner's Activity Report Form OAR-1 to be prepared and certified upon completion of each refueling outage. In accordance with the conditions of Regulatory Guide 1.147, this OAR-1 form is being submitted within ninety days of the completion of the refueling outage.

The IVVI report meets the reporting requirements of BWRVIP-18, "BWR Vessel and Internals Project, BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines" and BWRVIP-94, "BWR Vessel and Internals Project Program Implementation Guide."

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

Respectfully,

Danny G. Bost
Site Vice President
Dresden Nuclear Power Station

Attachments: Owner's Activity Report, Form OAR-1
Invessel Visual Inspection Report

cc: Regional Administrator – Region III
NRC Senior Resident Inspector, Dresden Station

bcc: Director – Licensing, Mid-West Regional Operating Group (K. Jury)
Plant Manager – Dresden Nuclear Power Station
Regulatory Assurance Manager – Dresden Nuclear Power Station
Regulatory Assurance Manager – Quad Cities Nuclear Power Station (W. Beck)
Manager - Licensing – Dresden and Quad Cities Stations (P. Simpson)
Illinois Emergency Management Agency – Division of Nuclear Safety
Manager of Energy Practice – Winston and Strawn
Site Engineering Director – Dresden Nuclear Power Station (M. Kanavos)
Engineering Programs Supervisor – Dresden Nuclear Power Station (J. Sipek)
Hartford Steam Boiler Inspection and Insurance Company
Attn. Mr. Paul Fisher
R. Bauman, ISI Coordinator – Dresden Nuclear Power Station
H. Do, NGG ISI Engineer
R. Rainey – ANII Dresden Nuclear Power Station
Document Control Desk – Licensing
Dresden Regulatory Assurance, SVP Letter File
SVP Numerical File – SVPLTR #05-0007

FORM OAR-1 OWNER'S ACTIVITY REPORT

Report Number Refueling Outage D3R18 OAR-1

Owner Exelon Generation Company (EGC, LLC), 200 Exelon Way, Kennett Square, PA, 19348
(Name and Address of Owner)

Plant Dresden Nuclear Power Station, 6500 N. Dresden Road, Morris, IL 60450
(Name and Address of Plant)

Unit No. 3 (if applicable) Commercial Service Date 11-16-1971 Refueling outage no. D3R18

Current inspection interval 4th Inspection Interval
(1st, 2nd, 3rd, 4th, other)

Current inspection period 1st Inspection Period
(1st, 2nd, 3rd)

Edition and Addenda of Section XI applicable to the inspection plan 1995 Edition with 1996 Addenda

Date and revision of inspection plan 05-30-2004, Revision 2

Edition and Addenda of Section XI applicable to repairs and replacements, if different than the inspection plan N/A

CERTIFICATE OF CONFORMANCE

I certify that the statements made in this Owner's Activity Report are correct, and that the examinations, tests, repairs, replacements, evaluations, and corrective measures represented by this report conform to the requirements of Section XI.

Certificate of Authorization No. None (if applicable) Expiration Date Not Applicable

Signed [signature] ,ISI Coordinator Date 2-21-05
Owner or Owner's Designee, Title

CERTIFICATE OF INSERVICE INSPECTION

I, the undersigned, holding a valid commission issued by the National Board of Boiler and Pressure Vessel Inspectors and the State or Province of Illinois, and employed by The Hartford Steam and Boiler Insurance and Inspection Co. of Hartford, Connecticut have inspected the items described in this Owner's Activity Report, during the period 01-20-2003 to 01-17-2005, and state that to the best of my knowledge and belief, the Owner has performed all activities represented by this report in accordance with the requirements of Section XI.

By signing this certificate neither the Inspector nor his employer makes any warranty, expressed or implied, concerning the examinations tests, repairs, replacements, evaluations, and corrective measures described in this report. Furthermore, neither the Inspector nor his employer shall be liable in any manner for any personal injury or property damage or a loss of any kind arising from or connected with this inspection.

[signature] Commissions IL 932, NB7742NISB
Inspector's Signature National Board, State, Province, and Endorsements

Date 2-23-05

TABLE 1
ABSTRACT OF EXAMINATIONS AND TESTS

Examination Category	Total Examinations Required for The Interval	Total Examinations Credited for This Period	Total Examinations Credited (%) For The Period	Total Examinations Credited (%) To Date for The Interval	Remarks
B-A	2	0	0	0	Components scheduled in accordance with Program B. One during the second inspection period and one during the third inspection period.
	21	0	0	0	Deferral Permissible
B-D	62	14	23	23	Components scheduled in accordance with Program B.
B-G-1	8	3	38	38	Deferral Permissible
B-G-2	37	8	22	22	Components scheduled in accordance with Program B.
	1	1	100	100	Examinations limited to components selected under Examination Category B-L-2 and B-M-2.
B-K	11	3	27	27	Components scheduled in accordance with Program B.
B-L-2	1	1	100	100	Examinations limited to disassembled components.
B-M-1	1	0	0	0	Deferral Permissible
B-M-2	5	5	100	100	Examinations limited to disassembled components.
B-N-1	3	0	0	0	One component examined each inspection period.
B-N-2	79	1*	1	1	Deferral Permissible *Portions of Core Support Structure Made Accessible
B-O	8	0	0	0	Deferral Permissible
B-P	10	2	20	20	Two pressure tests performed each refuel outage.
C-A	2	0	0	0	Components scheduled in accordance with Program B. One during the second inspection period and one during the third inspection period.
C-B	12	2	17	17	Components scheduled in accordance with Program B.
	18	0	0	0	Six components examined each inspection period.
C-C	11	3	27	27	Components scheduled in accordance with Program B.
C-H	36	4	11	11	Twelve pressure tests performed each inspection period.
F-A	154	42	27	27	Components scheduled in accordance with Program B.
R-A	69	15	22	22	Components scheduled in accordance with Program B.
	110	22	20	20	Twenty two components examined each refuel outage.

TABLE 2
ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT REQUIRED EVALUATION FOR CONTINUED SERVICE

Examination Category	Item Number	Item Description	Flaw Characterization (IWA-3300)	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)

No items with flaws or relevant conditions required evaluation for continued service during the period covered by this report.

TABLE 3
ABSTRACT OF REPAIRS, REPLACEMENTS, OR CORRECTIVE MEASURES REQUIRED FOR CONTINUED SERVICE

Code Class	Repair, Replacement, or Corrective Measure	Item Description	Description of Work	Flaw or Relevant Condition Found During Scheduled Section XI Examination or Test (Yes or No)	Date Completed	Repair/ Replacement Plan Number
1	Corrective Measure	Main steam sensing line support.	Replaced broken rod hanger assembly.	No	11/23/2004	3-04-063
2	Corrective Measure	HPCI Support M-1187D-75	Tightened loose bolted connection.	No	5/6/2004	N/A
2	Corrective Measure	HPCI Support M-1187D-83	Adjusted unloaded support.	No	11/19/2003	N/A
2	Corrective Measure	HPCI Support M-1187D-98	Tightened loose bolted connection.	No	5/6/2004	N/A
2	Repair	Integral Welded Attachment M-1200D-1015	Removed flaws and performed welded repair.	Yes	10/13/2003	3-03-017
2	Repair	Integral Welded Attachment M-1200D-1019	Removed flaws and performed welded repair.	Yes	12/17/2003	3-03-034

Invessel Visual Inspection Report
D3R18

Core Spray System Examinations

Previously identified Core Spray flaws have been addressed through lower sectional piping replacement of all four Core Spray lines. The lower sectional piping replacement replaced welds P4c, P4d, P5, P6, P7, P8a, P8b and P9 and removed all previously identified flaws on the Unit 3 Core Spray piping. The welds on the lower sectional replacement assemblies are not susceptible to IGSCC and will not require future inspections. The remaining Core Spray piping welds were visually examined during D3R18 as recommended in BWRVIP-18, "BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines." Additionally, all 8 of the Core Spray piping brackets were visually inspected after completion of the lower sectional replacement. No flaws were identified in the piping welds or the brackets.

Steam Dryer EPU Inspections

Detailed steam dryer inspections were performed in accordance with GE SIL 644 recommendations. Additional dryer component surfaces were examined to verify that the conditions previously identified at Quad Cities and Dresden were not present on the Dresden unit 3 dryer. During this inspection, flaws were identified in the support ring to the cover plate welds on the outer hoods and also in the outer hood vertical plate to dryer support ring welds. No loose parts were generated as a result of these flaws. The flaws were ground out and weld repairs performed. Additionally, the outer hoods were modified to address indications seen at Quad Cities in 2004. These modifications replaced the outer hood vertical plate with a 1" plate, extended the outer hood gussets and replaced the outer tie bars. These changes significantly reduced the stresses in the areas where the flaws were found. Additional indications found during the dryer inspection were determined to be non-structural and were either repaired or dispositioned for continued use.

Core Shroud Vertical Weld Inspections

The core shroud ring segment welds associated with the shroud head flange ring (V1-V4), top guide support ring (V8-V13), and core plate support ring (V20-V25) were visually inspected in accordance with the requirements of BWRVIP-76, "BWR Core Shroud Inspection and Flaw Examination Guidelines." Vertical oriented cracking in the vicinity of welds V23 and V25 was previously identified during D3R14. The D3R18 inspection resulted in no observed increase in indication size. Therefore, the identified cracking remains bounded by the current flaw evaluation. No new flaws were identified in the remaining vertical core shroud ring segment welds.