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RS-05-072

May 26, 2005

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 Supporting Main Steam Safety Valve Setpoint Tolerances and Tolerance Uncertainty Treatment Methodology

- References:
1. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Main Steam Safety Valve Setpoint Tolerances and Tolerance Uncertainty Treatment Methodology," dated October 29, 2004
 2. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Additional Information Supporting Main Steam Safety Valve Setpoint Tolerances and Tolerance Uncertainty Treatment Methodology," dated April 15, 2005

In Reference 1; Exelon Generation Company, LLC (EGC) requested NRC approval of a Monte Carlo statistical analysis of the main steam safety valve (MSSV) network for Dresden Nuclear Power Station, Units 2 and 3. The Monte Carlo statistical analysis was performed to determine an upper tolerance limit for MSSVs and safety/relief valves that more accurately predicts the distribution of pressures that result in the valves opening. The intent of the analysis was to demonstrate a statistically based technically valid alternative to traditional deterministically applied setpoint drift, which assumes that all of the valves drift to the highest possible setpoint.

EGC provided additional information regarding the Monte Carlo analysis in Reference 2. In response to NRC Request 1, EGC stated, in part:

The revised analysis, accounting for the positive 0.5% bias, shows that the amount of main steam pressure/flow relieved through the valve network modeled for the Monte Carlo analysis exceeds the amount of main steam pressure/flow relieved when an upper tolerance of 1.5 percent is applied to all valves. Therefore, the assumed setpoint drift of 1.5% applied to all valves remains valid.

Based upon further evaluation, EGC has determined that the above statement needs to be revised to read as follows:

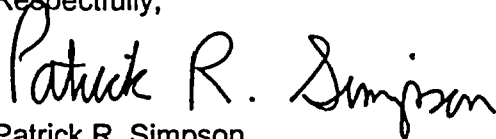
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The revised analysis, accounting for the positive 0.5% bias, shows that the amount of main steam pressure/flow relieved through the valve network modeled for the Monte Carlo analysis is comparable to the amount of main steam pressure/flow relieved when an upper tolerance of 1.75% is applied to all valves.

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

Respectfully,

A handwritten signature in black ink that reads "Patrick R. Simpson". The signature is written in a cursive style with a large initial "P".

Patrick R. Simpson
Manager – Licensing