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Dresden Nuclear Power Station  
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April 27, 2009

SVPLTR: #09-0014

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

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

Subject: 2008 Regulatory Commitment Change Summary Report

Please find enclosed the 2008 Commitment Change Summary for Dresden Nuclear Power Station as referenced in Attachment A. Revisions to docketed regulatory correspondence were processed using Nuclear Energy Institute's (NEI) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes", dated July 1999.

Should you have any questions concerning this summary, please contact Mr. Stephen Taylor, Regulatory Assurance Manager at 815-416-2800.

Respectfully,



Tim Hanley  
Site Vice President  
Dresden Nuclear Power Station

Enclosure: Attachment A: Dresden Nuclear Power Station Commitment Change Summary for 2008

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

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**Attachment A**  
**Dresden Nuclear Power Station**  
**Commitment Change Summary for 2008**

| <b>Commitment Revision Tracking No.</b> | <b>Date of Commitment Revision</b> | <b>Original Document</b>   | <b>Original Commitment</b>  | <b>Revised Commitment</b>  | <b>Basis For Revision</b>   |
|---|------------------------------------|--|---|--|---|
| 08-01                                   | 1/29/08                            | EGC Letter RS-06-015, dated January 26, 2006.  | EGC will continue to conduct daily monitoring of moisture carryover and other key reactor and plant parameters while operating at full power at Dresden Nuclear Power Station (DNPS) Units 2 and 3, and Quad Cities Nuclear Power Station (QCNPS) Units 1 and 2, to provide an early indication of potential dryer structural integrity issues. | Revised commitment letter, RS-07-053, dated April 20, 2007 did not include a commitment to conduct daily moisture carryover monitoring. Percent moisture carryover will now be determined per current recommended guidance, e.g. BWRVIP-139. Frequency will be controlled by station procedures. | The Unit 2 and 3 Steam Dryers were replaced in 2007 and 2008 respectively. Both units have shown <0.04% moisture carryover (MCO) since installing the new steam dryers. The Engineering Department completed an Engineering Change evaluation, EC 366106 Dresden Steam Dryer Monitoring Plan Following Replacement, to provide guidance for steam dryer performance. The conclusion of the evaluation is that MCO monitoring can now be conducted in accordance with BWRVIP-139. The current guidance in BWRVIP-139 is to sample for MCO on a weekly basis. |
| 08-02                                   | 2/28/08                            | Letter RS-03-001, Letter from J. Benjamin to NRC, Application for Renewed Operating Licenses, section B.1.12 | Current program is credited. Procedure ER-AA-2030, attachment A, Checklist states "No evidence of unusual corrosion or overheating (blister, discoloration)".   | Procedure ER-AA-2030, attachment A, Checklist wording has been revised as follows:<br><br>No evidence of overheating (blister, discoloration).<br><br>No evidence of corrosion on external surfaces (piping, bolting, equipment/components etc).   | This revised wording provides more prescriptive guidance to check for corrosion.  |

**Attachment A  
Dresden Nuclear Power Station  
Commitment Change Summary for 2008**

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|----------------------------------|-----------------------------|---|--|---|--|
| 08-03                            | 3/14/08                     | RS-04-020, Attachment Item 44 Heat Exchanger Test and Inspection<br><br>ATI 101522-45 | <p>Exelon has committed to implementing a Dresden plant specific, non-NUREG 1801, Heat Exchanger Test and Inspection Activities Aging Management Program (AMP) that manages loss of material, cracking, and buildup of deposits in heat exchangers in the scope of license renewal that are not tested and inspected by the Open-Cycle Cooling Water System (B.1.13) or the Closed-Cycle Cooling Water System (B.1.14) AMP. The augmentation activities identified in NUREG-1801, lines IV.C1.4-a and IV.C1.4-b to manage loss of material and cracking for the Dresden isolation condensers are included in this AMP.</p> <p>The Dresden Heat Exchanger Test and Inspection Activities AMP activities include <u>performance monitoring</u> and <u>periodic inspections</u> (condition monitoring) to manage loss of material, cracking and buildup of deposit aging effects. Loss of material and cracking are detected through visual inspections and NDE. Buildup of deposit is detected using a combination of system and component performance testing and component visual inspections.</p> | <p>Specific inspection frequencies stated in the corrective action program are subject to change as long as they remain consistent with the existing program commitment as reflected in the February 3, 2004 letter (RS-04-020) from Patrick R. Simpson, Exelon, to USNRC titled, Consolidated List of Commitments for License Renewal, and the program posted in the Electronic Data Management System (EDMS) under License Renewal.</p> | <p>Eddy current testing has been completed on both Unit 2 Isolation Condenser tube bundles. This was the first time eddy current testing was performed since the Isolation Condenser was installed (&gt;35 years) and no tubes required plugging. Therefore it is concluded that the material condition on the Unit 2 Isolation Condenser tube bundles is very good and the eddy current testing frequency can be adjusted in accordance with the company's existing equipment reliability procedures and processes.</p> |

**Attachment A**  
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| 08-04                            | 1/27/09                     | Letter from R.F. Janecek , CeCo to D. Eisenhut, NRC, regarding NUREG 0619 commitments dated 2/23/81. | On-line leakage monitoring systems consisting of thermocouples installed on feedwater lines will address the problems of cracking of Feedwater and CRD nozzles on Reactor Pressure Vessels | Delete the requirement to monitor feedwater temperature via leakage monitoring system. | BWR Owners Group recommended newer UT techniques that are now available as discussed in GE-NE-523-A71-0594, rev 0, Alternate BWR Feedwater Nozzle Inspection Requirements. These current recommendations that have been accepted by the NRC no longer recommend installing thermocouples for leakage monitoring. Thermocouples were unreliable in operation and will be removed. |
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