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U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington D.C. 20555-0001

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

Subject: Revised License Renewal Commitment for Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Reactor Internal Components

References:

- (1) Letter (RS-03-181) from Mr. Patrick R. Simpson (Exelon Generation Company, LLC), to the NRC, "Additional Information for the Review of the License Renewal Applications for Quad Cities Nuclear Power Station, Units 1 and 2 and Dresden Nuclear Power Station, Units 2 and 3," dated October 3, 2003
- (2) NUREG 1796, "Safety Evaluation Report Related to the License Renewal of the Dresden Nuclear Power Station, Units 2 and 3 and Quad Cities Nuclear Power Station, Units 1 and 2"

The purpose of this letter is to inform the NRC that Exelon Generation Company, LLC (EGC) is revising a commitment identified in References (1) and (2) for Dresden Nuclear Power Station (DNPS).

In Reference (1), as a part of EGC's license renewal application for DNPS, and as documented in reference 2, Appendix A, EGC made the following commitment:

An aging management program will be implemented for thermal aging and neutron irradiation embrittlement of Cast Austenitic Stainless Steel (CASS) reactor internal components within the scope of license renewal. A component specific evaluation for the loss of fracture toughness will be included. For those components where the loss of fracture toughness may affect the function of the component, an inspection will be performed as part of the ISI Program.

The commitment included an evaluation that requires the material composition be obtained from certified material test reports (CMTRs). The CMTRs could not be located for the components in question. The purpose of the commitment is to determine the CASS components where a loss of fracture toughness may affect the function of the component and to establish an inspection program for those susceptible components.

The inability to determine material composition from CMTRs affects the ability for EGC to evaluate CASS components for a loss of fracture toughness. Therefore, EGC conservatively assumed that

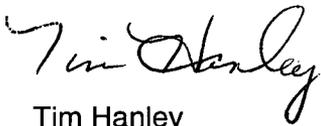
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all the components were susceptible and established an inspection program for these components, the same as would be required by the original commitment if an evaluation had concluded there was a loss of fracture toughness that may affect the function of the component.

As a result of the above, EGC is revising Commitment number 10 as documented in Appendix A to Reference 2. The revised commitment is included as Attachment 1 to this letter.

Should you have any questions concerning this letter, please contact Ms. Marri Marchionda at 815-416-2800.

Respectfully,



Tim Hanley
Site Vice President
Dresden Nuclear Power Station

Attachment: Summary of Regulatory Commitments

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

Attachment 1

SUMMARY OF REGULATORY COMMITMENTS

The following table identifies commitments made in this document. (Any other actions discussed in the document represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (Yes/No)	PROGRAMMATIC (Yes/No)
An aging management program will be implemented for thermal aging and neutron irradiation embrittlement of Cast Austenitic Stainless Steel (CASS) reactor internal components within the scope of license renewal. A component specific evaluation for the loss of fracture toughness will be included. If material composition cannot be determined, a loss of fracture toughness may be assumed as an alternative to a specific evaluation. For those components where it is assumed or the evaluation has determined a loss of fracture toughness may affect the function of the component, an inspection will be performed as part of the ISI Program	12/20/2009	No	Yes