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U. S. Nuclear Regulatory Commission
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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: License Renewal Commitment for Evaluation of Operating Experience at Extended Power Uprate Levels Prior to Period of Extended Operation

- Reference:
- (1) Letter from Keith R Jury (Exelon Generation Company, LLC) to U.S.NRC, "Additional Commitments for License Renewal," dated October 8, 2004 (RS-04-145)
 - (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"

As a result of recommendations from the Advisory Committee on Reactor Safeguards (ACRS) review of the Dresden Nuclear Power Station (DNPS) and Quad Cities Nuclear Power Station (QCNPS) License Renewal Application, Exelon Generation Company, LLC (EGC) made the following commitment in Reference 1:

"EGC will perform an evaluation of operating experience at extended power uprate (EPU) levels prior to the period of extended operation to ensure that operating experience at EPU levels is properly addressed by the aging management programs. The evaluation will include the Dresden and Quad Cities units and other plants operating at EPU levels. EGC will submit this evaluation to the NRC for review prior to entering the period of extended operation for each facility."

This commitment was also documented by the NRC in Reference 2.

The purpose of this letter is to document completion of the above stated commitment for DNPS Units 2 and 3. There are no new regulatory commitments contained in this letter.

EGC has performed an operating experience review and evaluation to ensure that operating experience at EPU levels is properly addressed by the aging management programs (AMPs) at DNPS Units 2 and 3. The review included experience reported by both EGC and non-EGC plants for operation at EPU conditions. The method of review and its results are presented below.

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Method of Review:

The Institute of Nuclear Power Operations (INPO) website contains a listing of events associated with power uprate. As of October 1, 2009, the site contained 161 operating experience reports. Each of these reports was reviewed and evaluated against the DNPS AMPs. These evaluations resulted in the identification of seventeen events applicable to the DNPS AMPs. Those events identified as applicable are discussed below under "Results of Review." Each event identified was found to be satisfactorily addressed by one or more AMPs with one exception noted under "Results of Review."

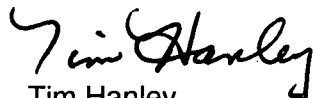
Additionally, an industry operating experience review was performed for each of the systems included in the scope of license renewal by DNPS Plant Engineering and Programs Engineering. These reviews consisted of OPEX searches using various combinations of the keywords "EPU" and "Extended Power Uprate" along with the system, program, or AMP name. No additional events were identified beyond those covered in the above paragraph.

Results of Review:

Seven of the seventeen events found to be applicable to DNPS were related to steam dryer failures. Steam dryers have been replaced on both units at DNPS with a new robust design and are managed for aging under AMP B.2.10, "Periodic Inspection of Steam Dryers." Nine of the events identified issues with active components (i.e., eight valves and one pump) that are included in the scope of license renewal. Active components do not require aging management and as such are not included in any AMP credited by license renewal. However, each of the components in this category is included in the site preventive maintenance program and is inspected/tested to ensure reliable operation. The one remaining issue identified degradation with a feedwater sparger bracket keeper. This component is within the scope of license renewal and requires aging management. Although this issue was previously identified as a concern at Dresden and added to the Reactor Internals Program for periodic inspection, it was not adequately addressed by an AMP. This issue has now been entered into the corrective action program to ensure that these components are addressed by an AMP.

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

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