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SVPLTR #10-0010

February 25, 2010

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

> Dresden Nuclear Power Station, Unit 2 Facility Operating License No. DPR-19 NRC Docket No. 50-237

Subject: Owner's Activity Report Submittal Fourth 10-Year Interval 2009 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 2 refueling outage (D2R21) which began on November 2, 2009, and was completed on December 2, 2009. This is the second refueling outage conducted in the second inspection period of the fourth 10-year inservice inspection interval for DNPS Unit 2. 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-532-4, "Repair/Replacement Activity 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 15. Code Case N-532-4 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 Code Case N-532-4, this OAR-1 form is being submitted within ninety days of the completion of the refueling outage.

The IVVI results are provided to report vessel internal inspections and to support B-N-1 and B-N-2 relief request examination completion.

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Should you have any questions concerning this letter, please contact Ms. Marri Marchionda-Palmer, Regulatory Assurance Manager, at (815) 416-2800.

Respectfully,

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Tim Hanley 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

FORM OAR-1 OWNER'S ACTIVITY REPORT

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Report Number	. Refueling Outage D2R21 OAR-1						
Plant	Dresden Nuclear Power Station, 6500 N. Dresden Road, Morris, IL 60450						
Unit No2	Commercial Service Date	06/09/1970	Refueling Outage Number	D2R21			
(if applicable) Current Inspection Interval	applicable) In Interval 4 th Inspection Interval						
Current Inspection Period	ion Period 2 nd Inspection Period						
Edition and Addenda of Section XI applicable to the Inspection Plans		(1 st , 2 nd , 3 rd	(1 ^x , 2 ^w , 3 ^v) 1995 Edition with 1996 Addenda				
Date / Revision of Inspection Plans		05/23/2008	05/23/2008/Revision 6				
Edition and Addenda of Section XI applicable to repair/replacement activities, if different than the inspection plans							
Code Cases used:	le Cases used: N-416-3, N-649						
I certify that (a) the stat ASME Code, Section XI; ar conform to the requiremer Signed	ements made in this report are correct, id (c) the repair/replacement activities its of Section XI <u>N. H. J. , ISI Coordinator</u> (Owner or Owner's designee. Title)	; (b) the examinations and evaluations supporti	nd tests, meet the Inspection Plan a ing the completion of $D2R2$ (refueling o Date $7/B/10$	35 required by the 21 Sutage number)			
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 HSBCT of Hartford , Connecticut							
have inspected the items described in this Owner's Activity Report, 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 repair/ replacement activities and evaluation 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							
Die		ons	IL 1546				
Date $\frac{2}{2}$	3/10	National Board	, State, Province, and Endorsements				

 TABLE 1

 ITEMS WITH FLAWS OR RELEVANT CONDITIONS THAT REQUIRED

 EVALUATION FOR CONTINUED SERVICE

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Examination			
Item Number	Item Description	Evaluation Description	
		New evaluation submitted to NRC as required by previous SER.	
Unit 2 Weld 2/1/0201A-		as Category F. Will examine again in D2R22. New evaluation	
28/PD1A-D14;IGSCC	During examination in D2R21, flaw depth changed from .25	submitted in letter dated 11/16/09, subject "Request for	
Category F	inches to .32 inches. No change in length.	Approval of Pipe Flaw Evaluation"	
	During D2R21, concerns raised involving examination		
28/PS2-TEF/202-4B-IGSCC	discussion with NRC decided to resubmit evaluations	New evaluation submitted to NRC in letter dated 12/07/09	
Category F	delineating limitations.	subject "Request for Approval of Updated Pipe Flaw Evaluation"	
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TABLE 2
ABSTRACT OF REPAIR/REPLACEMENT ACTIVITIES REQUIRED FOR CONTINUED SERVICE

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Code Class	Item Description	Description Of Work	Date Completed	Repair/ Replacement Plan Number
3	Leak Found On Unit 2 CCSW Vault Room Cooler	Repaired Leak On Cooler	10/09/09	RRP 2-09-022
1	Leak Found Upstream of Valve 2-202-5B Above Seat Drain Valves	Replaced Leaking Component, Cut Out Drain Valves and Capped	11/09/09	RRP 2-09-071
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Dresden Unit 2 In-Vessel Visual Inspection Report Refueling Outage D2R21

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The ASME Section XI inspections credited during D2R21 IVVI activities include the once-per-period B-N-1 inspection of the reactor vessel interior and B-N-2 inspections of reactor vessel interior attachments. Credit is being taken for these examinations in accordance with Relief Request, "Alternative Requirements to ASME Section XI, B-N-1 and B-N-2 using BWRVIP Guidelines, Fleet Relief," submitted April 19, 2007, as approved in the Safety Evaluation dated April 30, 2008.

To implement the requirements of the Boiling Water Reactor Vessel Internals Project (BWRVIP), General Electric-Hitachi was contracted to perform the In-Vessel Visual Inspections (IVVI). The following components and assemblies were examined:

- 80 welds and components on jet pump assemblies in accordance with the BWR Jet Pump Assembly Inspection and Flaw Evaluation Guidelines (BWRVIP-41).
- Ten core spray piping welds, 50% of the core spray sparger nozzle welds, all of the core spray sparger end cap welds and all of the core spray sparger bracket welds in accordance with the BWR Core Spray Internals Inspection and Flaw Evaluation Guidelines (BWRVIP-18-A).
- One shroud vertical weld in accordance with the BWR Core Shroud Inspection and Flaw Evaluation Guidelines (BWRVIP-76).
- Attachment welds for two core spray piping brackets in accordance with BWR Vessel and Internals Project Lower Vessel ID Attachment Weld Inspection and Flaw Evaluation Guidelines (BWRVIP-48-A).
- First time dryer examinations were performed after one cycle of operation (new dryer installed in D2R20). All critical inspections were completed with no cracking identified. Dryer inspections were performed in accordance with BWR Vessel and Internals Project Steam Dryer Inspection and Flaw Evaluation Guidelines (BWRVIP-139).

The following augmented in-vessel examinations were also performed as part of the D2R21 IVVI activities:

- Four jet pump swing gate bolting tack welds were inspected for evidence of weld failure. These inspections were performed in response to previous tack weld failures. Jet pump 15 swing gate was replaced in D2R21 due to identified tack weld degradation. The new swing gate utilized ratchets in lieu of tack welds. The jet pump 19 swing gate installed in D2R20 was inspected after one cycle of operation.
- Three jet pump auxiliary wedges installed during the last two refuel outages were inspected. Minor wear was noted on one of the wedges. Dresden will continue to monitor this condition until repairs/replacements are performed.
- Inspected two jet pump sensing line clamps and one sensing line due to previous indications. No new degradation identified.
- Inspected the eight feedwater sparger end bracket surfaces for evidence of wear. These inspections were a follow-up to evidence of wear from the pins observed during D2R20. Six of the eight brackets showed evidence of wear similar to that observed during D2R20. Dresden will continue to monitor this condition while long-term repair options are being evaluated.
- Six SRM/IRM dry tubes were inspected in accordance with SIL 409 guidance.
- Inspected a steam separator guide rod top cone. The dryer had contacted the guide rod during installation in D2R20.

The above BWRVIP and augmented examinations resulted in no indications identified in the reactor interior surface as defined in B-N-1 or the reactor interior attachments as defined by B-N-2.

Additionally, the four Core Spray lower sectional pipes were replaced removing all known cracking in core spray piping (in-vessel). The new piping was installed with bolted connections. No underwater welding was performed as part of this replacement.