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Dresden Nuclear Power Station
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April 30, 2010

SVPLTR: #10-0019

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: 2009 Regulatory Commitment Change Summary Report

Please find enclosed the 2009 Commitment Change Summary for Dresden Nuclear Power Station. 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. Patrick Quealy, Acting 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 2009

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 2009

Commitment Revision Tracking No.	Date of Commitment Revision	Original Document	Original Commitment	Revised Commitment	Basis For Revision
09-02	2/24/09	ComEd letter to D. Eisenhut dated 2/23/81	Install on line leakage monitoring systems. The monitoring systems will detect bypass leakage past the secondary seal by means of thermocouples mounted on the outside surface of the nozzles.	Exelon/Dresden is deleting the commitment to monitor the temperatures at the feedwater nozzles.	Dresden currently monitors the feedwater nozzles for cracking using Ultrasonic Testing methods rather than thermocouples. The UT testing is more reliable than the thermocouples.
09-07	7/7/09	Exelon letter RS-04-020, dated February 3, 2004.	One-Time inspection of HPCI lubrication oil hoses for age related degradation.	Delete Commitment for One-Time inspection of the HPCI lubricating oil system flexible hoses.	Commitment intention was to inspect the HPCI lubricating oil system flexible hoses, which were assumed to be made of elastomer material; however the hoses were actually determined to be carbon steel piping. Quad Cities identified these hoses as being made of carbon steel material during there one-time inspection. They also performed NDE on the carbon steel and determined that there was no degradation to the material. Quad Cities HPCI Turbine and lubricating system is identical to the one here at Dresden Station.
09-08	9/10/09	Dresden License Renewal Request. Letter RS-03-001, dated January 3, 2003.	Dresden committed to "BWR Water Chemistry Guidelines: 2000 Revision," EPRI TE 103515-R2, Final Report, February 2000 and subsequently BWRVIP – 130: BWR Vessel and Internals Project BWR Water Chemistry Guidelines – 2004.	Dresden commits to following the most recent EPRI Guideline for BWR Water Chemistry. The current guideline is BWRVIP-190: BWR Vessel and Internals Project, BWR Water Chemistry Guidelines – 2008 Revision, TR 1016579.	Dresden follows the current EPRI guidance in effect for BWR Water Chemistry Guidelines rather than an older version of the Guidelines.
09-09	7/2/09	Dresden SVP Letter JMHLTR 98-002, Response to Notice of Violation NRC Inspection Report 50-10/237/249/97019	DAP 03-05, Out of Service Process, was revised to include specific time limits associated with 4kV breakers that are out of service and being temporary lifted in the test position to be consistent with the limits found in the operating procedure DOP 6500-04, Racking out of Safety Related 4kV Breakers.	DOP 6500-04, rev 26 removed the time limits specifying how long a 4 kV breaker can be in the test position.	Engineering Change (EC) 353251 evaluated the total number of breakers which can be left in any position other than racked in, and still maintain seismic qualification. This administrative limitation is incorporated in procedure DOP 6500-04.

Attachment A
Dresden Nuclear Power Station
Commitment Change Summary for 2009

Commitment Revision Tracking No.	Date of Commitment Revision	Original Document	Original Commitment	Revised Commitment	Basis For Revision
09-22	SVP Letter 09-0053, dated 11/12/2009.		An aging management program will be implemented for thermal aging and neutron irradiation embrittlement of 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.	An aging management program will be implemented for thermal aging and neutron irradiation embrittlement of 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.	The commitment included an evaluation that requires the material composition be obtained from certified material test reports (CMTR5). 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. This change conservatively assumes that the components are susceptible and establishes an inspection program 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.