

Exelon Generation
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450-9765
Tel 815-942-2920

www.exeloncorp.com

SVPLTR: #10-0022

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May 15, 2010

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 Commitment for the Containment Leak Reduction & Control
Program for Gas Systems

References:

- (1) Commonwealth Edison letter from Cordell Reed and D.L. Peoples to the NRC – H.R. Denton dated November 21, 1979.
- (2) Commonwealth Edison letter from D.L. Peoples to the NRC – H.R. Denton 'Lessons Learned Short Term Requirements' dated January 1, 1980.

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) Commonwealth Edison proposed "Liquid systems will be visually inspected for leakage while systems are at approximate operating pressures. Gas systems will be evaluated using helium leak tests, pressure decay tests for specific tanks and metered make-up pressure tests."

In Reference (2) Commonwealth Edison stated "the test inspection methods used are as follows": part b. "Gaseous systems are tested by a combination of pressure decay on specific tanks or by helium leakage tests."

The gaseous systems in question are Standby Gas Treatment (SBGT) and Augmented Primary Containment Vent (APCV). Historically, EGC Dresden Station has been conducting visual inspections with the aid of smoke tubes, if needed, in order to identify leaks. These visual inspections remain the current method of testing, guided by procedure, and have been performed in lieu of helium testing.

Helium testing provides no advantage over visual inspections. Helium testing cannot quantify the leakage, only identify the location. The identification of a leak via visual inspection can be accomplished with the same rigor as helium testing.

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NRC

As a result, the commitment to perform helium testing is being revised. In order to satisfy the Site Leak Reduction Program, visual inspections with the aid of smoke tubes, if needed, will continue to be performed. The revised commitment is included as Attachment 1 to this letter. Should you have any questions concerning this letter, please contact Mr. Dennis Leggett, Regulatory Assurance Manager at 815-416-2800.

Respectfully,

A handwritten signature in black ink, appearing to read "Tim Hanley", written in a cursive style.

Tim Hanley
Site Vice President
Dresden Nuclear Power Station

Attachment: Commitment for Site Leak Reduction Program

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)
As part of the Site Leak Reduction Program, gas systems (Standby Gas Treatment and Augmented Primary Containment Vent) will be visually inspected, with the aid of smoke tubes, if needed, to identify leaks.	8/02/2010	No	Yes