



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION III  
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LISLE, IL 60532-4352

July 2, 2010

Mr. Charles G. Pardee  
Senior Vice President, Exelon Generation Company, LLC  
President and Chief Nuclear Officer, Exelon Nuclear  
4300 Winfield Road  
Warrenville IL 60555

**SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3  
NRC COMPONENT DESIGN BASES INSPECTION REPORT  
05000237/2010-007(DRS); 05000249/2010-007(DRS)**

Dear Mr. Pardee:

On May 21, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed a Component Design Bases inspection at your Dresden Nuclear Power Station, Units 2 and 3. The enclosed report documents the inspection findings, which were discussed on May 21, 2010, with Mr. Shane Marik and other members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

Based on the results of this inspection, three NRC-identified findings of very low safety significance were identified. The findings involved a violation of NRC requirements. However, because of their very low safety significance, and because the issues were entered into your corrective action program, the NRC is treating the issues as Non-Cited Violations (NCVs) in accordance with Section VI.A.1 of the NRC Enforcement Policy. Additionally, a licensee identified violation is listed in Section 4OA7 of this report.

If you contest the subject or severity of a Non-Cited Violation, you should provide a response within 30 days of the date of this inspection report, with the basis for your denial, to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission - Region III, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352; the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001; and the Resident Inspector Office at the Dresden Nuclear Power Station. In addition, if you disagree with the characterization of any finding in this report, you should provide a response within 30 days of the date of this inspection report, with the basis for your disagreement, to the Regional Administrator, Region III, and the NRC Resident Inspector at the Dresden Nuclear Power Station. The information that you provide will be considered in accordance with Inspection Manual Chapter 0305.

C. Pardee

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In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any), will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Ann Marie Stone, Chief  
Engineering Branch 2  
Division of Reactor Safety

Docket Nos. 50-237; 50-249  
License Nos. DPR-19; DPR-25

Enclosure: Inspection Report 05000237/2010-007; 05000249/2010-007  
w/Attachment: Supplemental Information

cc w/encl:

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-237; 50-249  
License Nos: DPR-19; DPR-25

Report No: 05000237/2010-007; 05000249/2010-007

Licensee: Exelon Generation Company, LLC

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: Morris, IL

Dates: April 19 through May 21, 2010

Inspectors: Stuart Sheldon, Senior Reactor Engineer (Team Lead)  
Carey Brown, Operations Inspector  
Mohammad Munir, Engineering Inspector  
Néstor Félix Adorno, Engineering Inspector  
Stanley Kobylarz, Electrical Contractor  
Stanley Spiegelman, Mechanical Contractor

Observer: Jorge Corujo-Sandin, Engineering Inspector

Approved by: Ann Marie Stone, Chief  
Engineering Branch 2  
Division of Reactor Safety

Enclosure

## SUMMARY OF FINDINGS

IR 05000237/2010-007; 05000249/2010-007; 04/19/2010 – 05/21/2010; Dresden Nuclear Power Station, Units 2 and 3; Component Design Bases Inspection (CDBI).

The inspection was a 3-week onsite baseline inspection that focused on the design of components that are risk significant and have low design margin. The inspection was conducted by regional engineering inspectors and two consultants. Three Green findings were identified by the inspectors. The findings were considered Non-Cited Violations (NCV) of NRC regulations. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 4, dated December 2006.

### A. NRC-Identified and Self-Revealed Findings

#### **Cornerstone: Mitigating Systems**

- Green. The inspectors identified a Non-Cited Violation (NCV) of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," having very low safety significance for the failure to establish inspection procedures that were appropriate for the circumstances for the NRC Generic Letter (GL) 89-13 program heat exchangers. Specifically, procedures did not contain adequate guidance for partially blocked heat exchanger tubes found to be completely blocked. As a result, the licensee did not evaluate the as-found conditions of the 2/3 Emergency Diesel Generator (EDG) jacket water heat exchangers; therefore, did not determine the heat exchangers were not bounded by applicable design documents. The licensee entered this issue into its corrective action program.

The performance deficiency was determined to be more than minor because it was associated with the mitigating system cornerstone attribute of procedure quality and affected the cornerstone objective. This finding was of very low safety significance because it was a qualification deficiency confirmed not to result in loss of operability or functionality. The inspectors determined that the finding had a cross-cutting aspect in the area of human performance because the licensee did not use a conservative assumption in decision making. Specifically, the licensee did not use a conservative assumption when establishing the acceptance criteria for the inspection of heat exchangers. H.1(b) (Section 1R21.3.b.1)

- Green. The inspectors identified an NCV of 10 CFR Part 50, Appendix B, Criterion II, "Quality Assurance Program," for improperly classifying Low Pressure Coolant Injection (LPCI) pump mechanical seals as non-safety-related. The licensee subsequently concluded that the seals should be classified as safety-related based upon Exelon procedure SM-AA-300 and parts classification Guide M-1994-300, and reclassified them as safety-related.

The performance deficiency was determined to be more than minor because if left uncorrected, it would become a more significant safety concern. This finding was of very

low safety significance because it was a qualification deficiency confirmed not to result in loss of operability or functionality. The inspectors determined that the finding had a cross-cutting aspect in the area of human performance because the licensee did not adopt a requirement to demonstrate that the proposed action is safe in order to proceed rather than a requirement to demonstrate that it is unsafe in order to disapprove the action. H.1(b) (Section 1R21.3.b.2)

- Green. The inspectors identified an NCV of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," for the failure to have an adequate post-maintenance test for circuit breakers to confirm fast bus transfer capability. Specifically, the licensee failed to ensure that either vendor overhaul procedures or the station procedure for receipt inspection confirmed that breaker timing tests were performed after the circuit breakers were overhauled at a vendor facility. The licensee entered this issue into its corrective action program.

The finding was more than minor because if left uncorrected, the finding could have the potential to lead to a more significant safety concern. This finding was of very low safety significance (Green) because the test deficiency was confirmed not to result in loss of operability or functionality. The inspectors did not identify a cross-cutting aspect associated with this finding because it was not reflective of current performance. (Section 1R21.3)

## **B. Licensee-Identified Violations**

A violation of very low safety significance that was identified by the licensee has been reviewed by inspectors. Corrective actions planned by the licensee have been entered into the licensee's corrective action program. This violation and corrective action tracking numbers are listed in Section 4OA7 of this report.

## 1. REACTOR SAFETY

### Cornerstone: Initiating Events, Mitigating Systems, and Barrier Integrity

#### 1R21 Component Design Bases Inspection (71111.21)

##### Introduction

The objective of the component design bases inspection is to verify that design bases have been correctly implemented for the selected risk significant components and that operating procedures and operator actions are consistent with design and licensing bases. As plants age, their design bases may be difficult to determine and an important design feature may be altered or disabled during a modification. The Probabilistic Risk-Assessment (PRA) model assumes the capability of safety systems and components to perform their intended safety function successfully. This inspectable area verifies aspects of the Initiating Events, Mitigating Systems, and Barrier Integrity cornerstones for which there are no indicators to measure performance.

Specific documents reviewed during the inspection are listed in the attachment to the report.

##### Inspection Sample Selection Process

The inspectors selected risk significant components and operator actions for review using information contained in the licensee's PRA and the Dresden Nuclear Power Station Standardized Plant Analysis Risk Model, Revision 3.5. In general, the selection was based upon the components and operator actions having a risk achievement worth of greater than 1.3 and/or a risk-reduction worth greater than 1.005. The operator actions selected for review included actions taken by operators both inside and outside of the control room during postulated accident scenarios. In addition, the inspectors selected operating experience issues associated with the selected components.

The inspectors performed a margin assessment and detailed review of the selected risk significant components to verify that the design bases have been correctly implemented and maintained. This design margin assessment considered original design reductions caused by design modification, or power uprates, or reductions due to degraded material condition. Equipment reliability issues were also considered in the selection of components for detailed review. These included items such as performance test results, significant corrective action, repeated maintenance activities, Maintenance Rule (a)(1) status, components requiring an operability evaluation, NRC resident inspector input of problem areas/equipment, and system health reports. Consideration was also given to the uniqueness and complexity of the design, operating experience, and the available defense in depth margins. A summary of the reviews performed and the specific inspection findings identified are included in the following sections of the report.

This inspection constituted 29 samples as defined in Inspection Procedure 71111.21-05.

## Component Design

### a. Inspection Scope

The inspectors reviewed the Updated Final Safety Analysis Report (UFSAR), Technical Specifications (TS), design basis documents, drawings, calculations and other available design basis information, to determine the performance requirements of the selected components. The inspectors used applicable industry standards, such as the American Society of Mechanical Engineers (ASME) Code, Institute of Electrical and Electronics Engineers (IEEE) Standards and the National Electric Code, to evaluate acceptability of the systems' design. The NRC also evaluated licensee actions, if any, taken in response to NRC issued operating experience, such as Bulletins, Generic Letters (GLs), Regulatory Issue Summaries (RISs), and Information Notices (INs). The review was to verify that the selected components would function as designed when required and support proper operation of the associated systems. The attributes that were needed for a component to perform its required function included process medium, energy sources, control systems, operator actions, and heat removal. The attributes to verify that the component condition and tested capability was consistent with the design bases and was appropriate may include installed configuration, system operation, detailed design, system testing, equipment and environmental qualification, equipment protection, component inputs and outputs, operating experience, and component degradation.

For each of the components selected, the inspectors reviewed the maintenance history, system health reports, operating experience-related information and licensee corrective action program documents. Field walkdowns were conducted for all accessible components to assess material condition and to verify that the as-built condition was consistent with the design. Other attributes reviewed are included as part of the scope for each individual component.

The following 19 components were reviewed:

- Unit 3 125Vdc Station Battery/Battery Charger: The inspectors reviewed calculations and analyses relating to battery sizing and capacity, hydrogen generation, station blackout (SBO) coping, and battery room transient temperature. The review was performed to ascertain the adequacy and appropriateness of design assumptions, and to verify that the battery was adequately sized to support the design basis required voltage requirements of the 125Vdc safety-related loads under both design basis accident and SBO conditions. The inspectors reviewed calculations relating to sizing and current limit setting to ascertain the adequacy and appropriateness of design assumptions, and to verify that the charger was adequately sized to support the design basis duty cycle requirements of the 125Vdc safety-related loads and the associated battery under both normal and design basis accident conditions. The inspectors also reviewed a sampling of completed surveillance tests, service tests, and modified performance tests. The review of various discharge tests was to verify that the battery capacity was adequate to support the design basis duty cycle requirements and to verify that the battery capacity meets TS requirements. In addition, the test procedures were reviewed to determine whether maintenance and testing activities for the battery charger were in accordance with vendor's recommendations.

- 125Vdc Buses 3 and 3A: The inspectors reviewed 125Vdc short circuit calculations to verify the interrupting ratings of the fuses and the molded-case circuit breakers were well above the calculated short circuit currents. The 125Vdc voltage calculations were reviewed to determine if adequate voltage would be available for the breaker open and close coils and spring charging motors. The inspectors reviewed the motor control logic diagrams and the 125Vdc voltage drop calculation to ensure adequate voltage would be available for the control circuit components under all design basis conditions. The inspectors also reviewed the 125Vdc short circuit and coordination calculations to assure coordination between the motor feed breaker open and close control circuit fuses and 125Vdc supply breakers and to verify the interrupting ratings of the control circuit fuses and the 125Vdc control power feed breaker.
- 250 Vdc Motor Control Center 2: The inspectors reviewed 250Vdc short circuit calculations to verify the interrupting ratings of the molded-case circuit breakers were well above the calculated short circuit currents. The 250Vdc voltage calculations were reviewed to determine if adequate voltage would be available for the contactor coils. The inspectors reviewed the motor control logic diagrams and the 250Vdc voltage drop calculation to ensure adequate voltage would be available for the control circuit components under all design basis conditions. The inspectors also reviewed the 250Vdc short circuit and coordination calculations to assure coordination between the motor feed breaker open and close control circuit fuses and 250Vdc supply breakers and to verify the interrupting ratings of the control circuit fuses and the 250Vdc control power feed breaker.
- 4160Vac Switchgear 23-1 (SWGR 23-1): The inspectors reviewed the one line diagrams, the short circuit and load flow calculation, and the switchgear vendor specifications to determine maximum load, interrupting duty and bus bracing requirements for design basis conditions and to verify conformance with switchgear equipment vendor ratings. The breaker coordination calculation was reviewed to verify selective coordination. Switchgear and circuit breaker maintenance results were reviewed for indications of adverse conditions. A walkdown was conducted to determine the visible material condition and any potential seismic II/I conditions.
- 480Vac Motor Control Center 28-1 (MCC 28-1): The inspectors reviewed the one line diagrams, the short circuit and load flow calculation, and the MCC vendor specifications to determine maximum load, interrupting duty and bus bracing requirements for design basis conditions and to verify conformance with MCC equipment vendor ratings. The breaker coordination calculation was reviewed to verify selective coordination. Motor control center and circuit breaker maintenance results were reviewed for indications of adverse conditions. A walkdown was conducted to determine the visible material condition and any potential seismic II/I conditions.
- Unit Aux Transformer (UAT) to Reserve Aux Transformer (RAT) Bus Transfer: The inspectors reviewed a white paper analysis for fast bus transfer and the modification that installed replacement circuit breakers that implemented the fast bus transfer scheme. The replacement circuit breaker procurement specification and vendor test results were reviewed for conformance with design basis fast bus transfer requirements. Modification tests and circuit breaker overhaul tests were reviewed to confirm adequate breaker time testing and a finding was identified.



- 2/3 Emergency Diesel Generator (EDG): The inspectors reviewed EDG fuel consumption and tank level setpoint calculations to assess the capacity of the fuel oil storage and day tanks. The inspectors reviewed underground tank buoyancy and structural calculations, and procedures to assess the fuel oil storage tank protection against external events such as flooding and earthquakes. The fuel oil monitoring limits were reviewed to assess fuel oil quality. The inspectors reviewed room heat-up, jacket water, and lube oil cooling calculations to assess the 2/3 EDG cooling capacity. Also, the inspectors reviewed calculations and surveillances associated with starting air to assess starting air capacity. The inspectors reviewed design documentation associated with seismic protection to assess the protection against external events and vendor specifications to make sure that these parameters had been correctly translated into calculations, as required. Design change history, corrective actions, surveillance results, and trending data were reviewed to assess potential component degradation and impact on design margins. The inspectors performed visual non-intrusive inspections to assess the installation configuration, material condition, and potential vulnerability to hazards.
- 2/3 Diesel Fuel Oil Transfer Pump: The inspectors reviewed system hydraulic calculations such as those associated with net positive suction head (NPSH) and vortexing to ensure that the pump was capable of providing its functions. The inspection also included a review of operating procedures related to these functions. The inspectors reviewed design documentation associated with seismic protection to assess the protection against external events and vendor specifications to make sure that these parameters had been correctly translated into calculations, as required. In addition, the inspectors reviewed design change history, corrective actions, surveillance results, and trending data to assess potential component degradation and impact on design margins. The inspectors performed visual non-intrusive inspections to assess the installation configuration, material condition, and potential vulnerability to hazards.
- Instrument Air (IA) System: The inspectors reviewed the IA system design to verify the system would function as described in the USAR and reviewed the design basis calculations. Procedures were reviewed to assure that appropriate measures were taken to implement station shutdown in the event of all instrument air per UFSAR commitment. The inspectors reviewed corrective action program documents and work orders to verify that design and maintenance issues were fully evaluated and resolved. The inspectors reviewed system piping and instrumentation diagrams and performed a system walk-down with licensee staff to evaluate the material condition of plant equipment. The main steam isolation valve (MSIV) accumulator was reviewed to assure effective resolution of past material issues.
- Low Pressure Coolant Injection (LPCI) Pump 2A: The inspectors reviewed LPCI Pump 2A to assure that the Regulatory commitments that have been made in the UFSAR and TS are being met. Specifically the post Extended Power Uprate (EPU) pump operating parameters were evaluated to assure adequate flow for short term and long term containment conditions. Because the NPSH calculations assume credit for containment pressure following a Design Basis Accident, the containment pressure calculation was reviewed for minimum containment pressure conditions. The inspectors reviewed motor sizing and pump brake horsepower requirements and vendor ratings for conformance with design basis load conditions. The inspectors also reviewed load flow analysis to determine the adequacy of voltage at

motor terminals during degraded voltage conditions and the adequacy of feeder cable sizing. The motor protective device coordination curves and overcurrent relay tests were reviewed to determine the adequacy of protection and coordination for electrical components. Finally the team performed a walkdown of the LPCI pump and motor, and interviewed the systems engineer to evaluate operating performance and recent history.

- 2A LPCI/Component Cooling Service Water (CCSW) Heat Exchanger (Hx): The team reviewed the LPCI/CCSW Hx to evaluate actions that are being taken to mitigate performance declines due to intrusion of biological materials. Recent thermal calculations were reviewed to evaluate the test data as compared to the regulatory and design basis commitments. Corrective action and root cause reports were reviewed to evaluate the licensee's actions from identified causes. Biocide injection activities were reviewed including a modification package that is being installed to improve the biocide injection program. The LPCI systems engineer and the program manager for the biocide program were interviewed to discuss corrective actions. A tube vibration analysis was reviewed and potential tube vibration was compared with eddy current test results. The eddy current program manager was interviewed to discuss the history of the eddy current testing.
- Unit 2 Reactor Building Closed Cooling Water (RBCCW) Pumps: The inspectors reviewed the U2 RBCCW pumps design to verify its capability to meet design basis assumptions with respect to pump flow and pressure. The inspectors reviewed drawings, procedures, vendor manuals, pump curves, and tests to verify assumptions were accurate and justified. The inspectors interviewed the system engineer to discuss the acceptable performance and capability of the pumps to provide the required flow rates in addition to discuss any current issues. The system overall health was reviewed with emphasis on maintenance rule requirements, previous condition reports and current performance issues. The inspectors reviewed the equipment's seismic classification and requirements, and verified its appropriateness based on design assumptions and possibility to affect surrounding equipment. A number of walkdowns were conducted to determine the material condition of the pumps and adjacent areas.
- Unit 2 Standby Liquid Control System (SLC) Pumps: The inspectors reviewed system hydraulic calculations such as those associated with NPSH and vortexing to ensure that the pumps were capable of providing their accident mitigating function. The inspection also included a review of operating procedures related to these functions. The inspectors reviewed vendor specifications to make sure that these parameters had been correctly translated into calculations, as required. Design change history, corrective actions, surveillance results, and trending data were reviewed to assess potential component degradation and impact on design margins. The inspectors reviewed motor sizing and pump brake horsepower requirements and vendor ratings for conformance with design basis load conditions. The inspectors also reviewed load flow analysis to determine the adequacy of voltage at motor terminals during degraded voltage conditions and the adequacy of feeder cable sizing. The motor protective device coordination curves and thermal overload relay selection were reviewed to determine the adequacy of motor protection and coordination for electrical components. Motor starter inspection results were reviewed for indications of adverse conditions. The inspectors

performed visual non-intrusive inspections to assess the installation configuration, material condition, and potential vulnerability to hazards.

- Unit 2 SLC Tank: The inspectors reviewed boron injection volume and tank level set-point calculations to assess the tank capacity. The boron concentration limits were reviewed to ensure consistency with applicable design documents. The inspectors also reviewed structural calculations to assess the structural integrity of the tank and vendor specifications to verify these parameters had been correctly translated into calculations, as required. Design change history, corrective actions, surveillance results, and trending data were reviewed to assess potential component degradation and impact on design margins including TS volume limits. The inspectors performed visual non-intrusive inspections to assess the installation configuration, material condition, and potential vulnerability to hazards.
- Isolation Condenser Backup Makeup Water Motor Operated Valve (MOV) 3-4102: The inspectors reviewed completed surveillances to ensure that actual performance was monitored. Design change history and corrective actions were reviewed to assess potential component degradation. The inspectors performed visual non-intrusive inspections to assess the installation configuration, material condition, and potential vulnerability to hazards.
- Unit 3 Isolation Condenser Condensate Return Inboard Containment Isolation MOV 3-1301-4: The inspectors reviewed the MOV 3-1301-4 required design basis. The MOV calculations for required thrust and weak link analysis was also reviewed. The inspectors reviewed drawings, procedures, tests, performed surveillances and operability evaluations associated with the MOV. The MOV's required opening and closing times were reviewed to verify they were within the allowable limits. The system's overall condition was reviewed based on previous condition reports, modifications performed on the equipment and discussions with knowledgeable engineers associated with the system.
- Reactor Water Clean Up (RWCU) System MOV 3-1202-2: The inspectors reviewed RWCU System MOV 3-1202-2 to assure that it can meet its safety function to close on demand. The MOV valve engineer was interviewed to gain an understanding of the valve design, operating performance and maintenance history. The weak link analysis was reviewed and compared with the Midas results from the valve testing program. Key values were reviewed to assure that the design basis was correctly used in the test analysis. Further, maintenance records from the past three years were reviewed to determine if any changes were made in the design.
- RBCCW MOV 2-3706: The inspectors reviewed the RBCC inboard isolation valve to assure that it can meet its safety function of closing on demand. The weak link and seismic thrust and torque calculations were reviewed and compared to results from the valve testing program from the past 2 tests. The MOV valve engineer was interviewed to discuss the Midas results and recent valve operating performance. The TSs and UFSAR were reviewed to determine if specific regulatory or design commitments were made regarding this valve in addition to containment isolation. Finally, the log of past maintenance activities was reviewed to evaluate the maintenance program.

- Unit 2 High Pressure Coolant Injection (HPCI) Gland Seal Condenser: The inspectors reviewed eddy current test results to assess the condition of the gland seal condenser. Operating procedures were reviewed to ensure that parameters had been correctly translated from specifications. The inspectors reviewed design documentation associated with seismic protection to assess the protection against external events. Design change history and corrective actions were reviewed to assess potential component degradation. The inspectors performed visual non-intrusive inspections to assess the installation configuration, material condition, and potential vulnerability to hazards.

b. Findings

(1) Failure to Establish Heat Exchanger Inspection Procedures Appropriate for the Circumstances.

Introduction: A finding of very low safety significance and associated Non-Cited Violation (NCV) of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the failure to establish inspection procedures that were appropriate for the circumstances for the GL 89-13 program heat exchangers.

Description: On May 11, 2010, the inspectors identified that the guidance contained in licensee procedures resulted in the inappropriate acceptance of as-found conditions of the 2/3 EDG jacket water heat exchangers. The as-found conditions were not bounded by applicable design documents and were not evaluated.

Each EDG had two parallel jacket water heat exchangers that removed heat from the EDGs. Heat is rejected to a dedicated service water system referred to as diesel generator cooling water (DGCW). The inspectors noted that the applicable design documents associated with the 2/3 EDG jacket water heat exchangers showed zero design margin. Specifically, operation of four Unit 2 CCSW pumps will result in degradation of Unit 2/3 DGCW flow because the systems discharged to a common header, creating a strong-vs.-weak pump effect. As a result, operation of four CCSW pumps was only allowed by applicable procedures at DGCW intake temperatures less than or equal to 82°F and operation of three CCSW pumps was only allowed at temperatures less than or equal to 91°F. The maximum allowed service water intake temperature was 95°F. In addition, calculation ATD-0400, "Unit 2/3 diesel generator jacket water cooler capacity," established operability limits based on no tubes blocked and low levels of fouling. However, the inspectors noted that the annual inspection results of the 2/3 EDG jacket water heat exchangers showed the presence of macrofouling (i.e., shells) in 2007, 2008, and 2010. In addition, the inspectors reviewed pictures taken at the time of the heat exchangers inspect-and-clean activities and noted shells which were about the size of the inner diameter of the tubes inside the tubes. The worst as-found condition was a total of approximately 31 shells in the two 2/3 EDG jacket water heat exchangers in 2010.

The inspectors noted that, although the as-left condition of the jacket water heat exchangers was clean (i.e., no macrofouling), the licensee did not: (1) assess the past-operability of the 2/3 EDG and (2) evaluate the adequacy of the frequency of the inspect-and-clean activities of the jacket water heat exchangers. The inspectors were concerned because the as-found conditions of the 2/3 EDG jacket water heat exchangers were not bounded by applicable design documents and were not evaluated. Specifically, the inspectors noted that ER-AA-2007, "Management of Design and Operating Margins,"

defined analyzed design limit as the limiting condition of a system or component from an engineering perspective and that this value is typically found in engineering calculations. It further stated that analytical margins are an unanalyzed region that cannot be used unless an analysis is performed to establish a new analyzed design limit. The inspectors noted that calculation ATD-0400 explicitly established the analyzed design limits for the 2/3 EDG jacket water heat exchangers and that a new analyzed design limit was not established to bound the as-found conditions.

The discovery of macrofouling during the inspect-and-clean activities conducted in 2007, 2008, and 2010 were not considered to be outside of the analyzed design limits by the licensee because the acceptance criteria required 100 percent flow blockage to remove a tube from service. Specifically, ER-AA-340-1002, "Service Water Heat Exchanger Inspection Guide," stated that prior to each inspection a pre-conceived set of visual inspection acceptance criteria shall be recorded on the heat exchanger inspection report. This procedure also included a note that stated that 100 percent flow blockage was required to remove a tube from service. The inspectors noted that the licensee established an acceptance criteria in 2007, 2008, and 2010 that was consistent with the guidance of ER-AA-340-1002 and confirmed through interviews with the licensee that partial blockage of tubes was viewed as acceptable because the tube surface area remained active as long as flow existed. However, the inspectors determined the mathematical model used in the calculation assumed uniform fluid and thermal behaviors across all the tubes. Therefore, partial blockage and its impact on the fluid dynamics in the heat exchanger were not evaluated.

As a result of the inspectors' concerns, the licensee performed a new analysis and determined that 10 out of 216 tubes at each 2/3 EDG jacket water heat exchanger (i.e., a total of 20 out of 432 tubes) could be completely blocked and the heat exchanger would remain operable. The worst as-found condition was considered bounded by the result of this analysis. The inspectors did not have further concerns.

The licensee captured this issue in their corrective action program as AR01071081. The corrective actions included revising calculations and procedures to include the acceptable maximum numbers of tubes that could be blocked and guidance on assessing the impact of flow blockage due to macrofouling of the tubes on the heat removal capability of heat exchangers.

Analysis: The inspectors determined that the failure to establish inspection procedures appropriate for the circumstances for the GL 89-13 program heat exchangers was contrary to 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," and was a performance deficiency.

The performance deficiency was determined to be more than minor because it was associated with the mitigating system cornerstone attribute of procedure quality and affected the cornerstone objective of ensuring the capability of systems that respond to initiating events to prevent undesirable consequences. Specifically, the inspectors had reasonable doubt on the past operability of the 2/3 EDG because the as-found conditions of the jacket water heat exchangers were not bounded by applicable design documents. A new analysis was required to demonstrate operability. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of findings," Table 4a for the mitigating system cornerstone. The finding

screened as of very low safety significance (Green) because the finding was a qualification deficiency confirmed not to result in loss of operability or functionality. Specifically, the licensee performed an analysis that determined the maximum acceptable amount of completely blocked tubes for the 2/3 EDG heat exchanger. The worst as-found condition was re-evaluated to be bounded by design documents.

The inspectors determined that the finding had a cross-cutting aspect in the area of human performance because the licensee did not use a conservative assumption in decision making. Specifically, the licensee failed to establish appropriate procedures because the licensee made a non-conservative assumption that partial tube blockage was acceptable without further evaluation when establishing the acceptance criteria for the heat exchangers inspections in 2007, 2008 and 2010. [H.1(b)]

Enforcement: Title 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires, in part, that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances.

Contrary to the above, as of May 11, 2010, the procedures used for the inspection of GL 89-13 program heat exchangers were not appropriate to the circumstances. Specifically, procedure ER-AA-340-1002 required the licensee to remove heat exchangers from service if fully blocked tubes were found; however, did not contain appropriate acceptance criteria for heat exchangers with partially blocked tubes. For the 2/3 EDG jacket water heat exchangers, the procedure was deficient, in that, partially blocked tubes were considered acceptable; however, this condition was outside the analyzed design limits specified calculation ATD-0400. Because this violation was of very low safety significance and it was entered into the licensee's corrective action program as AR01071081 this violation is being treated as an NCV, consistent with Section VI.A.1 of the NRC Enforcement Policy (NCV 05000237/2010007-01; 05000249/2010007-01 Failure to Establish Heat Exchanger Inspection Procedures Appropriate for the Circumstances).

(2) Improper Reclassification of LPCI Pump Mechanical Seals

Introduction: A finding of very low safety significance and associated NCV of 10 CFR Part 50, Appendix B, Criterion II, "Quality Assurance Program," was identified by the inspectors for improperly classifying LPCI pump mechanical seals as non-safety-related.

Description: Title 10 CFR 50.2 in part, defines safety-related structures, systems and components as those structures, systems and components that are relied upon to remain functional during and following design basis events to assure the capability to prevent or mitigate the consequences of accidents, which could result in potential offsite exposures comparable to the applicable guideline exposures set forth in 10 CFR 100.11. Title 10 CFR Part 50, Appendix B, Criterion II, requires in part, that licensees identify the structures, systems, and components to be covered by the quality assurance program, i.e., safety-related components.

Exelon procedure SM-AA-300 requires that parts within safety-related host components, that are required for the host to perform its safety function, be classified as safety-related. In engineering evaluation EC 376561, dated August 11, 2009, the licensee changed the classification of the LPCI pump mechanical seals from safety-related to non-safety-related, thus removing the quality assurance requirements associated with safety related

components from these mechanical seals. The licensee believed that credible failures would result in minimal leakage.

The inspectors reviewed the licensee's reclassification evaluation and concluded the licensee did not provide adequate analysis to demonstrate the failures of these seals during a design basis event would not result in reactor coolant leakage that would affect the safety function of the LPCI pump nor result in radiation doses comparable to regulatory limits. The inspectors reviewed the materials, construction, and installation of the seals and determined that failure of a seal could result in significant leakage. The inspectors also determined that failure of a seal during a design basis loss of coolant accident would reasonably result in control room radiation dose approaching the 10 CFR Part 50 Appendix A, Criterion 19 limit of 5 rem. The licensee subsequently concluded that the seals should be classified as safety-related based upon Exelon procedure SM-AA-300 and parts Classification Guide M-1994-300, and documented this in AR 1070607.

Analysis: The inspectors determined the licensee's reclassification of the LPCI pump mechanical seals to non safety-related was contrary to Exelon procedure SM-AA-300 and parts classification guide M-1994-300 and was a performance deficiency.

The finding was determined to be more than minor because the finding, if left uncorrected, would become a more significant safety concern. Specifically, by removing the quality assurance requirements for this part, the licensee reduced the assurance that replacement parts are of sufficient quality to assure reliable service during and following design basis events. The inspectors concluded this finding was associated with the mitigating systems cornerstone.

The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of findings," Table 4a for the Mitigating Systems cornerstone. The finding screened as of very low safety significance (Green) because the finding was a qualification deficiency confirmed not to result in loss of operability or functionality.

This finding has a cross-cutting aspect in the area of human performance, decision because the licensee did not adopt a requirement to demonstrate that the proposed action is safe in order to proceed rather than a requirement to demonstrate that it is unsafe in order to disapprove the action. Specifically, the licensee accepted the conclusion a seal failure would result in minimal leakage without requiring an evaluation to demonstrate this conclusion was appropriate. H.1(b),

Enforcement: Title 10 CFR Part 50, Appendix B, Criterion II, "Quality Assurance Program," requires, in part, that the licensee identify the structures, systems, and components to be covered by the quality assurance program.

Contrary to the above, between August 11, 2009, and May 18, 2010, the licensee failed to assure that the LPCI pump mechanical seals were identified as components to be covered by the quality assurance program. Specifically, the licensee inappropriately classified the mechanical seals as non safety-related. Because this violation was of very low safety significance and it was entered into the licensee's corrective action program as AR 01070607, this violation is being treated as an NCV, consistent with Section VI.A.1 of the

NRC Enforcement Policy (NCV 05000237/2010007-02; 05000249/2010007-02: Improper Reclassification of LPCI Pump Mechanical Seals).

(3) Failure to Perform Adequate Testing to Confirm Acceptable Fast Bus Transfer Time

Introduction: A finding of very low safety significance and associated NCV of 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," was identified by the inspectors for the failure to perform adequate testing after circuit breaker overhaul to confirm acceptable fast bus transfer time.

Description: A fast bus transfer is accomplished automatically from the UAT to the RAT offsite power source following a unit generator trip provided a fault does not exist on the bus. Section 8.3.1.2.1 of the UFSAR states that this transfer occurs fast enough to preclude load trip due to undervoltage. In a white paper, "Bus Transfer at Dresden and Quad Cities Stations," dated July 23, 1991, the licensee referenced a 1958 American Institute of Electrical Engineers (AIEE) paper, which recommended 6-cycle maximum "dead time" limit.

In safety-related modification M12-0-91-019D, the licensee replaced the original General Electric Magne Blast breakers with 4,160 volt Merlin Gerin circuit breakers. Licensee procedure ENC-QE-06, Design Modifications, Section 5C.1.4.1, required, in part, that the Cognizant Engineer, "Ensures that the basic design criteria, regulatory and functional requirements for design are identified and documented in sufficient detail to permit the detailed design activity to be carried out in a correct manner." However, the inspectors noted the licensee did not identify nor evaluate the design bases breaker performance requirements for the fast bus transfer scheme. Specifically, the licensee did not include post-modification testing to ensure the bus transfer scheme bus "dead time" was equivalent to or less than the recommended 6-cycle maximum "dead time" limit. However, the inspectors noted individual breaker testing performed by the manufacturer adequately demonstrated the breakers would meet the fast bus transfer scheme.

In addition, the inspectors noted the modification package did not include requirements for periodic testing or post-maintenance testing after a breaker overhaul to ensure the continued capability of the fast transfer within design limits. Specifically, the Merlin Gerin circuit breakers were overhauled by an outside 10 CFR Part 50, Appendix B qualified vendor (NLI). The inspectors identified the overhaul procedure, NLI-TECH-P110, did not require or perform breaker "as-left" close/trip time testing. In addition, the licensee's preventive maintenance and receipt inspection (new or rebuilt) breaker testing procedure, MA-AB-725-117, also did not time-test breakers to demonstrate satisfactory breaker trip and close time that is required for the fast bus transfer scheme. Refurbished circuit breakers have been installed in locations within the plant; however, the inspectors confirmed the circuit breakers currently installed for the UAT to RAT fast bus transfer had not been overhauled. The inspectors noted that there were no restrictions placed on the overhauled breakers; therefore, these breakers could be installed at any time in these locations.

Analysis: The inspectors determined that the failure to have an adequate circuit breaker post-maintenance test to confirm fast bus transfer capability was contrary to station modification procedure ENC-QE-06 requirements and was a performance deficiency. Specifically, the licensee failed to ensure that either the vendor's circuit breaker overhaul



procedure or the station procedure for receipt inspection confirmed that breaker timing tests were performed after the circuit breakers were overhauled at a vendor facility.

The finding was determined to be more than minor because if left uncorrected, the performance deficiency would have the potential to lead to a more significant safety concern. Specifically, the non-tested breakers could be used in the UAT to RAT transfer application which would impact the ability of other safety-related systems and components from fulfilling their safety function. The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase 1 - Initial Screening and Characterization of findings," Table 4A, for the mitigation systems cornerstone. The finding screened as "Green" because the finding did not represent an actual loss of safety function of a single train. This finding impacted the mitigating systems cornerstone.

The inspectors did not identify a cross-cutting aspect associated with this finding because this was an old design issue and therefore was not reflective of current performance.

Enforcement: Title 10 CFR Part 50, Appendix B, Criterion XI, "Test Control," requires, in part, that a test program shall be established to assure that all testing required to demonstrate that structures, systems, and components will perform satisfactorily in service is identified and performed in accordance with written test procedures, which incorporate the requirements and acceptable limits contained in applicable design documents.

Contrary to the above, on August 15, 1994, the licensee failed to establish appropriate test requirements and acceptance criteria that would demonstrate that the station fast bus transfer scheme would function after circuit breaker maintenance was performed. Specifically, the licensee failed to ensure that either vendor circuit breaker overhaul procedures or the station procedure for receipt inspection confirmed that breaker timing tests were performed after the circuit breakers were overhauled at a vendor facility in 2008. Because this violation was of very low safety significance and it was entered into the licensee's corrective action program as AR 01071691, this violation is being treated as an NCV, consistent with Section VI.A.1 of the NRC Enforcement Policy (NCV 05000237/2010007-03; 05000249/2010007-03: Failure to Perform Adequate Testing to Confirm Acceptable Fast Bus Transfer Time).

#### Operating Experience

##### a. Inspection Scope

The inspectors reviewed six operating experience issues to ensure that NRC generic concerns had been adequately evaluated and addressed by the licensee. The operating experience issues listed below were reviewed as part of this inspection:

- IN 2001-13, Inadequate SLC relief valve margin;
- IN 2006-16, Spurious Relay Actuations Result in Loss of Power to Safeguards Buses;
- IN 2007-09, Equipment Operability Under Degraded Voltage Conditions;
- IN 2008-06, Instrument Air System Failure Resulting in Manual Reactor Trip;

- IN 2010-09, Importance of Understanding Circuit Breaker Control Panel Indications; and
- GL 2008-01, Gas Intrusion in ECCS Systems.

b. Findings

No findings of significance were identified.

Modifications

a. Inspection Scope

The inspectors reviewed three permanent plant modifications related to selected risk-significant components to verify that the design bases, licensing bases, and performance capability of the components had not been degraded through modifications. The modifications listed below were reviewed as part of this inspection effort and do not constitute a separate sample:

- EC350135, Change boron enrichment in SLC;
- EC 376404, Install a supplemental Chemical Injection System to inject Biocide chemical into CCSW Keep Fill Lines; and
- M12-0-91-019D, Bus 23 Station Blackout Tie-In and 4kV Enhancement;

b. Findings

No findings of significance were identified.

Risk Significant Operator Actions

a. Inspection Scope

The inspectors performed a margin assessment and detailed review of four risk-significant, time critical operator actions. These actions were selected from the licensee's PRA rankings of human action importance based on risk-achievement worth values. Where possible, margins were determined by the review of the assumed design basis and UFSAR response times and performance times documented by job performance measures results. For the selected operator actions, the inspectors performed a detailed review and walk through of associated procedures, including observing the performance of some actions in the station's simulator and in the plant for other actions, with an appropriate plant operator to assess operator knowledge level, adequacy of procedures, and availability of special equipment where required.

The following operator actions were reviewed:

- Control RPV Water Level (high) to Prevent Overfill;
- Control RPV Water Level (low) during ATWS;

- Switch to Reserve DC Power; and
- Diagnose and Terminate Reactor Building Flooding.

b. Findings

No findings of significance were identified.

**4. OTHER ACTIVITIES**

4OA2 Identification and Resolution of Problems

Review of Items Entered Into the Corrective Action Program

a. Inspection Scope

The inspectors reviewed a sample of the selected component problems that were identified by the licensee and entered into the corrective action program. The inspectors reviewed these issues to verify an appropriate threshold for identifying issues and to evaluate the effectiveness of corrective actions related to design issues. In addition, corrective action documents written on issues identified during the inspection were reviewed to verify adequate problem identification and incorporation of the problem into the corrective action program. The specific corrective action documents that were sampled and reviewed by the inspectors are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

4OA5 Other Activities

.0 (Closed) Low Pressure Coolant Injection Pump Mechanical Seals  
(URI 05000237/2009-004-03; 05000249/2009-004-03)

The inspectors reviewed an unresolved item (URI) related to the classification of LPCI pump mechanical seals. A finding was identified and is documented in Section 1R21.3.b(2).

4OA6 Meeting(s)

Exit Meeting Summary

On May 21, 2010, the inspectors presented the inspection results to Mr. Shane Marik, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors asked the licensee whether any materials examined during the inspection should be considered proprietary. Several documents reviewed by the inspectors were considered proprietary information and were either returned to the licensee or handled in accordance with NRC policy on proprietary information.

#### 4OA7 Licensee-Identified Violations

The following violation of very low safety significance (Green) [or Severity Level IV] was identified by the licensee and is a violation of NRC requirements, which meets the criteria of Section VI.A.1 of the NRC Enforcement Policy for being dispositioned as an NCV.

A finding of very low safety significance (Green) and associated NCV of 10 CFR Part 50, Appendix B, Criterion III, "Design Control," was identified by the licensee for the failure to assure that 125 VDC and 250 VDC safety-related batteries were installed in accordance with their seismic qualification. During a walkdown of the 125 VDC and 250 VDC batteries, the licensee noted that the ethafoam spacers between individual battery cells and against battery racks were not tight in spots due to 1/4 inch gaps and should have thicker or additional ethafoam. The finding was more than minor due to impacting the mitigating systems cornerstone objective to ensure the availability, reliability, and capability of systems that respond to initiating events to prevent undesirable consequences. The licensee entered this nonconformance into its corrective action program as AR01032718 and AR01054241 and initiated work orders to evaluate and replace the ethafoam spacers with properly sized material. To establish a reasonable assurance of operability, the licensee reviewed seismic experience database reports from the Seismic Qualification Utility Group (SQUG). Experience from actual seismic events has shown that batteries without spacers or with thinner spacers have survived earthquakes stronger than the Dresden design basis earthquake.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

### KEY POINTS OF CONTACT

#### Licensee

S. Marik, Plant Manager  
J. Sipek, Engineering Director  
D. Leggett, Regulatory Assurance Manager  
T. Loch, Design Engineering Manager  
J. Reda, Mechanical/Structural Design Manager  
J. Griffin, Regulatory Assurance

#### Nuclear Regulatory Commission

C. Phillips, Senior Resident Inspector

### LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

#### Opened

|  |     |   |
|--|-----|---|
| 05000237/2010007-01;<br>05000249/2010007-01, | NCV | Failure to Establish Heat Exchanger Inspection Procedures Appropriate for the Circumstances |
| 05000237/2010007-02;<br>05000249/2010007-02, | NCV | Improper Reclassification of LPCI Pump Mechanical Seals                                     |
| 05000237/2010007-03;<br>05000249/2010007-03, | NCV | Failure to Perform Adequate Testing to Confirm Acceptable Fast Bus Transfer Time            |

#### Closed

|  |     |   |
|--|-----|---|
| 05000237/2010007-01;<br>05000249/2010007-01,   | NCV | Failure to Establish Heat Exchanger Inspection Procedures Appropriate for the Circumstances |
| 05000237/2010007-02;<br>05000249/2010007-02,   | NCV | Improper Reclassification of LPCI Pump Mechanical Seals                                     |
| 05000237/2010007-03;<br>05000249/2010007-03,   | NCV | Failure to Perform Adequate Testing to Confirm Acceptable Fast Bus Transfer Time            |
| 05000237/2009-004-03;<br>05000249/2009-004-03, | URI | Low Pressure Coolant Injection Pump Mechanical Seals  |

#### Discussed

None

## LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety, but rather, that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

### CALCULATIONS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>   | <b><u>Date or Revision</u></b> |
|----------------------|--|--------------------------------|
|                      | Containment (LPCI) Heat Exchanger Study (Tube Vibration Analysis)  | 1                              |
| 002316(CQD)          | Stress analysis and requalification of SLC tank  | 04/29/10                       |
| 0590-107-007         | Charger Alarm Set Points   | 0                              |
| 10553-CALC-03        | Dresden EDG fuel oil storage tanks volume  | 03/23/07                       |
| 10553-CALC-05        | EDG fuel oil day tanks volume calculation  | 04/20/93                       |
| 10553-CALC-07        | EDG endurance calculations   | 01/30/07                       |
| 5569-31-19-1         | 125 VDC Fault Currents   | 4                              |
| 5569-31-19-2         | 125 VDC System Breaker and Fuse Coordination   | 3                              |
| 7927-25-19-1         | Protective Device Setting Verification   | 0                              |
| 8-11.6-11            | Seismic qualification of buried diesel fuel tanks  | 08/24/92                       |
| 8900-77-19-1         | Calc. for Contactor/Interposing Relay Coil Voltage During Starting   | 009C                           |
| 8982-13-19-2         | Calc. for Contactor Relay Coil Voltage   | 002A                           |
| ATD-0400             | Unit 2/3 diesel generator jacket water cooler capacity   | 07/07/94                       |
| CC-AA-309-1001       | ATTACHMENT 1 Design Analysis Major Revision cover sheet: Weak Link Analysis of Overthrust Load for MOV MO3-1301-4  | 4                              |
| CE-007-12, 006-3     | MOV Allowable Stem Thrust for Valve 3-1201-2,1   | 1                              |
| CQD-002316           | Stress Analysis And Requalification Of Standby Liquid Control Tank   | 05/11/82                       |
| D2/3 MSIV-I          | Safety Related Air Lines for the Inboard MSIV's @ Dresden 2 & 3  | 3                              |
| DR-27D-M-018         | Engine Jacket Water Cooling System Line Sizing Verification  | 09/28/93                       |
| DR-292-M-001         | Instrument Air Piping Required Wall Thickness  | 0                              |
| DR-368-M-003         | Determine Hole Size for Instrument Air System Check Valves   | 3                              |
| DRE 01-0057          | Comparison of EPU and Pre-EPU NPSH for Old and New Strainers For Long And Short Term Events, Assuming One Strainer 100 Percent Blocked And 3 Strainers Clean | 0                              |
| DRE 01-0057          | (Minor Revision to Revision 0 For Blocked Strainers And Strainer Type)   | 0A                             |
| DRE 01-0066          | Dresden Unit 2 and 3 Standby Liquid Control System Discharge Piping Pressure Drop  | 2                              |

|                                |  |          |
|--------------------------------|--|----------|
| DRE 02-0033                    | Ultimate Suppression Pool PH Following a LOCA  | 02/09/10 |
| DRE 03-0010                    | Reactor Water Clean-up System Combined DBD and DP Calculation  | 0, 0A    |
| DRE 03-0013                    | LPCI Combined DBD and DP Calculation   | 0        |
| DRE 03-0025                    | Baseline Calculation for 125 VDC ELMS-DC Conversion to DCSDM   | 000N     |
| DRE 03-016                     | Reactor Building Closed Cooling Water Combined DP and DBD Calculation                                  |          |
| DRE 04-0003                    | Baseline Calculation for 250 VDC ELMS-DC Conversion to DCSDM   | 0        |
| DRE 05-0037                    | Seismic Qualification of 4kV Switchgear with Breakers in Test Position or Removed                      | 0        |
| DRE 05-0038                    | Auxiliary Power Analysis for Dresden Unit 2  | 001D     |
| DRE 05-0048                    | Dresden Units 2 and 3 Post LOCA EAB, LPZ, and CR Dose – Alternate Source Term Analysis                 | 0        |
| DRE 06-0001                    | NPSH for EDG Diesel Fuel Oil Transfer Pump   | 04/13/07 |
| DRE 06-0023                    | Diesel Generator Room Ventilation  | 04/09/07 |
| DRE 06-211<br>(Part 1,2 and 3) | LPCI Derivation of System Resistance Curves, Pump Curves and Comparison with LOCA                      | 6        |
| DRE 07-002                     | EDG Loading for LPCI Pump – LOCA Long Term Cooling   | 0        |
| DRE 07-021                     | Determination of Battery Inter-Cell Connector Resistance Limits  | 0        |
| DRE 09-017                     | 2B Instrument Air Receiver Tank Wall Thickness Requirements and Rerating the Pressure Vessel           | 0        |
| DRE 96-135                     | DG Starting Air Compressor and Receiver Pressure Setpoints Analysis                                    | 10/01/96 |
| DRE 96-149                     | Breaker Settings for Bus 28 and 29   | 3        |
| DRE 96-189                     | Voltages on Loads Fed from the Safety Related 250 V Batteries  | 3        |
| DRE 96-211                     | LPCI Derivation of System Resistance Curves, Pump Curves and Comparison with LOCA Analysis (3 parts)   | 6        |
| DRE 96-214                     | Derivation of Differential Pressure Between the LPSI and CCSW Sides of the CCSW Hx for Various Flows   | 0        |
| DRE 96-103                     | Weak Link Calculation for Crane 6 in Gate Valve (for 2-3706)   | 0A       |
| DRE 96-179                     | Sizing of the Unit 3 125 VDC Battery Chargers 3 and 3A   | 0        |
| DRE 97-012                     | Dresden LPCI/Core Spray NPSH Analysis Post-DBA LOCA: Short Term Design Basis                           | 3        |
| DRE 97-042                     | Evaluation/Justification for extending the EQ Lubrication/Inspection Interval from 18 to 24 months     | 0        |
| DRE 97-068                     | Minimum Flow Through the LPCI and HPCI Minimum Flow Lines (4 parts)                                    | 2, 2B    |
| DRE 97-073                     | LPCI/CCSW Hx Differential Pressure   | 0        |
| DRE 97-145                     | Maximum Flow Through the LPCI and HPCI Minimum Flow Lines (4 parts)                                    | 2,2A     |
| DRE 98-031                     | Unit 2 Reactor Building MCC Thermal Overload Relay Heater Sizing for AC Loads at Post LOCA Temperature | 1        |

|                           |   |           |
|---------------------------|---|-----------|
| DRE 98-117                | LPCI Heat Exchanger K Factor  | 0, 0A, 0B |
| DRE 98-197                | Standby Liquid Control Tank Boron Injection Volume                                      | 12/11/06  |
| DRE-2-3706                | Midacalc results for Dresden Unit 2 AC Motor Gate Valve (Work in Process)               | 1         |
| DRE-2-3706                | Midacalc for Dresden Unit 2 AC Motor Operated Gate Valve (As built)                     | 2         |
| DRE-3-1201-2              | Midacalc Results Dresden Unit 3 DC Motor Operated Gate Valve Calculation                | 4         |
| EC 342994                 | Containment Cooling Service Water (CCSW) System Water Hammer Loss of Keep-Fill Analysis | 0         |
| EC 368594                 | Fatigue Assessment of ISCO MOV 3-1301-4 Overthrust Condition                            | 0         |
| EC 370261                 | System Scope For GL 2008-01 and SER 2-05 GAS Intrusion                                  | 4/7/08    |
| ENC-QE-51.D               | Sodium Pentaborate Requirements for the SLC   | 08/19/91  |
| GE-NE-A22-0013-08-01      | Task T0400 – Containment System Response  | 1         |
| NED-M-MSD-072             | The Thrust Seismic of Dresden Non-Mark I, MO3-1201-2                                    | 1         |
| NED-M-MSD-072, Ad 7       | The Thrust Seismic of Dresden Non-Mark I, (for 2/3 3706)                                | 0         |
| NED-M-MSM-2               | Sodium Pentaborate Requirements for the SLC Systems                                     | 08/19/91  |
| OTC-382                   | Crane Alloyco, Thrust Analysis for Valve 2/3 3706                                       | 1         |
| SO 280685 pumps 270419/26 | Bingham Pump Company, Cavitation Test Report 12x14x14-1/2 CVDS Pumps                    | 5/22/69   |
| VE-4                      | Dresden Unit 3 Battery Room Ventilation   | 0         |
| VT-16                     | Turbine Room Ventilation Requirements   | 0         |

#### CORRECTIVE ACTION PROGRAM DOCUMENTS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>                                | <b><u>Date</u></b> |
|----------------------|---|--------------------|
| AR 00075599          | Potential for SLC Relief Valve lifting                            | 09/18/01           |
| AR 00079135          | NRC Concerns  | 10/16/01           |
| AR 00081637          | 2B MSIV Accumulator Inlet Ck Valve 2-220-85B Leakage Test Failure | 10/28/01           |
| AR 00151287          | Crack in MSIV "A" Accumulator, EPN * 3-0220-82                    | 3/29/03            |
| AR 00151288          | Minor Leaks on 3 of 4 MSIV's at the Air Line to Manifold Conn     | 3/29/03            |
| AR 00151955          | Walkdown Notes Discrepancies in As-Built Configuration            | 3/29/03            |
| AR 00169181          | Containment Requiring More Frequent Venting                       | 7/26/03            |
| AR 00186282          | Unit 2 Disconnected from the Grid Due to Main TR 2 Oil Leak       | 11/14/03           |
| AR 00198148          | NRC PI&R ID 151287-51 Closure Documentation Improvement           | 10/17/03           |
| AR 00393863          | As Found IST Leakage Test Exceeds Admin Limit                     | 11/02/05           |
| AR 00556697          | Air Leak at "D" Outboard MSIV Accumulator                         | 11/11/06           |



# CORRECTIVE ACTION PROGRAM DOCUMENTS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>  | <b><u>Date</u></b> |
|----------------------|---|--------------------|
| AR 00571424          | Target Rock Accumulator Does Not Meet T.S. Bases Parameter                        | 12/19/06           |
| AR 00616606          | 2/3 RBCCW PP LOW AMPS AND POSSIBLY DEADHEADED                                     | 04/13/07           |
| AR 00626209          | U2/3 RBCCW PP DEAD-HEADED IN PARALLEL WITH 3B RBCCW PP                            | 05/07/07           |
| AR 00694387          | MOV 2-1301-4 FOUND IN OVER-THRUST CONDITION                                       | 11/04/07           |
| AR 00696567          | INCORRECT METHODOLOGY IN OVERTHRUST CALC FOR MOV 3-1301-4                         | 11/08/07           |
| AR 00698426          | REMOVE AND REPLACE DISC IN MOV 3-1301-4   | 11/13/07           |
| AR 00744053          | U2 RBCCW PP SUCTION HEADER CONTAINS AIR POCKET                                    | 03/03/08           |
| AR 00744496          | IMPROOVE U2(3) RBCCW VENTING CAPABILITIES   | 03/04/08           |
| AR 00747629          | AIR POCKET REMAINS IN THE U2 RBCCW PP SUCTION HEADER                              | 03/10/08           |
| AR 00748107          | AIR IDENTIFIED IN THE U2/3 RBCCW PP SUCTION HEADER                                | 03/11/08           |
| AR 00749282          | AIR IDENTIFIED IN THE 2/3 RBCCW PP SUCTION HEADER FROM U3                         | 03/13/08           |
| AR 00750912          | RBCCW PUMP SWAP DUE TO POOR PERFORMANCE   | 03/17/08           |
| AR 00752497          | FREEZE SEAL PROCEDURE MA-AA-736-610 SECTION 4.4.7 HAS A FLAW                      | 03/18/08           |
| AR 00772915          | OPEX – Industry Experiences Involving Instrument Air Lines                        | 12/30/08           |
| AR 00776598          | 3B LPCI Hx Inspection Results   | 5/13/08            |
| AR 00805955          | NRC Generic Letter 89-13 Commitment Not Being Performed Apparent Cause Evaluation | 8/11/08            |
| AR 00814420          | Water In-Leakage Into The U2 East Reactor Building Corner Room                    | 09/05/08           |
| AR 00844349          | WORK PACKAGE INSTRUCTIONS REVISED DURING WORK                                     | 11/12/08           |
| AR 00845739          | 2/3 RBCCW PMP ERRATIC OPERATION   | 11/16/08           |
| AR 00911050          | Unexpected LPCI Pump Seal Flow High Alarm (U2)                                    |                    |
| AR 00917349          | Calculation Error Regarding Target Rock Accumulator Volume                        | 5/08/09            |
| AR 00926605          | Oil leak On The 2/3 DG Turbo Lube Oil Y-Strainer                                  | 06/02/09           |
| AR 0094775           | Omission from Required CR120A Contact Retainer Replacement                        | 07/28/09           |
| AR 00950011          | NRC Identified use of Non-Safety-Related Seal in 2A LPCI Pump                     | 8/6/09             |
| AR 00952577          | OP Eval for LPCI Pump Seals Has Been Extended                                     | 8/11/09            |
| AR 00961025          | EOC Review T.S. 5.5.2 for Proper Classification                                   | 8/28/09            |
| AR 00967008          | 2A LPCI Hx Degraded Thermal Performance   | 9/18/09            |

CORRECTIVE ACTION PROGRAM DOCUMENTS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>                                     | <b><u>Date</u></b> |
|----------------------|--|--------------------|
| AR 00969490          | LPCI Gland Seal Leak-off Isolation found closed                        | 9/23/09            |
| AR 00975076          | U2/3 EDG Started on RX Trip When Aux Power Transferred                 | 10/03/09           |
| AR 00977050          | IN 2009-16 Spurious Relay Actuations Cause Loss of Power               | 10/09/09           |
| AR 00981151          | Replace Flexible Hoses on the 2/3 EDG Jacket Water System              | 10/19/09           |
| AR 00983037          | Issues With Structural Calculation For Unit 2 SLC tank                 | 10/22/09           |
| AR 00990160          | 2/3 EDG Auto Started When U3 Main Generator Was Tripped                | 11/06/09           |
| AR 01007844          | 2/3 RBCCW PP Incompatible With 3B RBCCW PP                             | 12/20/09           |
| AR 01008320          | Air Identified In The 2/3 RBCCW PP Suction Header From U3              | 12/21/09           |
| AR 01013232          | Non-Conservative AC Motor Voltage Used for MOV Thrust Calc             | 01/06/10           |
| AR 01024943          | UNIT 3 RBCCW PP Swap Results   | 02/02/10           |
| AR 01029338          | Need A Contingency Forced Outage Work Order Created                    | 02/12/10           |
| AR 01030739          | CDBI FASA Issues Concerning Critical Operator Actions                  | 2/15/10            |
| AR 01031890          | Test Criteria for DC TOL Relays Not in DES 8300-01 and 8300-03         | 02/17/10           |
| AR 01032550          | U3 HPCI Aux Oil Motor not Torqued to Seismic Requirement               | 10/23/02           |
| AR 01032718          | Battery Cells Seismic Qual. Issue 125/250 VDC                          | 02/19/10           |
| AR 01032793          | 2/3 RBCCW PP VENTING LONG-TERM ACTION                                  | 02/19/10           |
| AR 01033065          | Effect of Degraded Voltage on HPCI MSC and AOP                         | 2/19/10            |
| AR 01033268          | Inadequate Basis for HPCI AOP Degraded Voltage Acceptance Criteria     | 02/20/10           |
| AR 01034523          | HPCI LOC and GSC Flow Less Than Design Due To Assumption               | 02/23/10           |
| AR 01035130          | Operating Time of MOVs Are Non-Conservatively Modeled in Calculation   | 02/24/10           |
| AR 01041989          | Alarm, High Seal Flow on 3 LPCI PP DTP 9 Leakage Related               | 3/13/10            |
| AR 01053690          | Water In-leakage U2 Reactor Building East Corner Room on 2-1501-5B MOV | 04/07/10           |
| AR 01054241          | Battery Cells Seismic Qualification Concern Unit 3 125 VDC Main        | 04/08/10           |
| AR 01055840          | Non-Conservative RPV Water Level Used For Containment Analysis         | 04/13/10           |
| AR 01057139          | IN 2010-09 Circuit Breaker Control Power Indications                   | 04/15/10           |
| AR 01059108          | NERC Identified Incorrect basis for parts Eval No. D-1999-251-02       | 4/20/09            |
| AR 01061366          | NER NC-10-028 Yellow – Fleet Response to H.B. Robinson Event           | 04/26/10           |

## CORRECTIVE ACTION PROGRAM DOCUMENTS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>   | <b><u>Date</u></b> |
|----------------------|--|--------------------|
| RCR 776598-08        | Dresden 3-1503-B, 3B LPCI Containment Cooling HX Failure to Meet Design Basis Heat Removal Capacity due to Inadequate Programatic Controls               | 5/27/09            |
| RCR 967008-03        | Dresden 2-1503-A,2A LPCI Containment Cooling Hx Failure to Meet Design Basis Heat Removal Capacity due to Asiatic Clam Micro Fouling Resulting From..... | 9/18/09            |

## CAP DOCUMENTS RESULTING FROM THE INSPECTION

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>                             | <b><u>Date</u></b> |
|----------------------|--|--------------------|
| AR 01060128          | Typo in Calculation Design Input                               | 04/22/10           |
| AR 01060530          | NRC CDBI: MCC Doors Not Fully Latched                          | 04/23/10           |
| AR 01060652          | NRC CDBI: UFSAR Section 8.3.1.5.1 Discrepancy                  | 04/21/10           |
| AR 01062239          | Incorrect Fuse Model Listed in Passport                        | 04/27/10           |
| AR 01063415          | NRC CDBI – Calculation 041326(CMED) Needs to be Revised        | 04/15/10           |
| AR 01063691          | NRC CDBI: WO Created For Closed Op Eval Still Open             | 04/30/10           |
| AR 01064916          | NRC CDBI: Incorrect Allowable Stress Used In Evaluation        | 05/03/10           |
| AR 01065327          | NRC CDBI: Non-conservative Specific Gravity Used               | 05/03/10           |
| AR 01065434          | Typographical Error in Calculation Text                        | 05/04/10           |
| AR 01065444          | NRC CDBI: Calculation DRE98-0031 Discrepancy                   | 05/04/10           |
| AR 01065734          | NRC CDBI: Vulnerability on EDG fuel oil day tank setpoint      | 05/05/10           |
| AR 01066167          | LPCI Pump Motor Power Factor Discrepancy                       | 05/06/10           |
| AR 01066707          | CDBI NRC: RBCCW Pump Bolt Identified W/O Full Thread Engage    | 05/07/10           |
| AR 01066711          | Completion of Breaker Rating Design Input                      | 05/07/10           |
| AR 01067821          | NRC CDBI: Discrepancy between TS Bases and FSAR                | 05/11/10           |
| AR 01068475          | Typographical Error in Calculation                             | 05/12/10           |
| AR 01069334          | NRC CDBI: Lack of Documented 4KV Auto Bus Transfer Analysis    | 05/14/10           |
| AR 01070256          | NRC CDBI: Calculation 8.11.6-11 Enhancement Opportunity        | 05/17/10           |
| AR 01070565          | Error in Per Unit Conversion                                   | 05/18/10           |
| AR 01071081          | NRC CDBI: DCP1008-04 Does not Conserve Design Basis Assumption | 05/19/10           |
| AR 01071219          | NRC ID'D Concern with Racked Out Breaker                       | 05/19/10           |
| AR 01071293          | NRC CDBI: NRC Requested Documentation Could Not Be Located     | 05/19/10           |
| AR 01071691          | NRC CDBI: 4KV Fast Bus Transfer Timing Tests with AMHG GCBS    | 05/20/10           |
| AR 1071842           | 4KV Racking Procedures Require Revision                        | 05/21/10           |

## DRAWINGS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>   | <b><u>Revision</u></b> |
|----------------------|--|------------------------|
| 12E-2301             | Single Line Diagram Standby Diesel Generator 2 and 2/3<br>4KV Bus 23-1, 4KV Bus 24-1, 4KV Bus 40 | AU                     |
| 12E-2303             | Key Diagram 4160 Switchgears 23 and 24   | V                      |
| 12E-2304             | Key Diagram 4160V Switchgears 23-1 and 24-1  | V                      |
| 12E-2318             | Key Diagram Reactor Building 480V Motor Control Center<br>28-                                    | AX                     |
| 12E-2321             | Key Diagram 250V DC Motor Control Centers  | AP                     |
| 12E-2322B            | Overall Key Diagrams 125Vdc Distribution Centers   | L                      |
| 12E-2328             | Single Line Diagram Emergency Power System   | N                      |
| 12E-2338             | Schematic Diagram Generator and Transformer Tripping<br>Relays Primary System                    | AP                     |
| 12E-2342             | Schematic Diagram 4160V Bus 23 Main and Reserve Feed<br>G.C.B.'s                                 | AE                     |
| 12E-2343             | Schematic Diagram 4160V Bus 24 Main and Reserve Feed<br>G.C.B.'s                                 | AF                     |
| 12E-2344             | Schematic Control Diagram 4160V Bus 23-1 Feed Breakers   | W                      |
| 12E-2398             | Schematic RBCCW System MOV   | F                      |
| 12E-2509B            | Schematic Primary Containment Isolation System for MOV<br>1201-2 & 1201-3 Control                | W                      |
| 12E-3311             | Key Diagram Turbine Building 480V MCC 38-2 and 39-2  | AU                     |
| 12E-3321             | Key Diagram 250V DC Motor Control Centers  | AF                     |
| 12E-3322A            | Key Diagram Turbine Building 125V DC Main Bus<br>Distribution Panels                             | Y                      |
| 12E-3325             | Key Diagram 120 and 120/240 AC Distribution Essential<br>Service Bus and Instrument Bus          | AC                     |
| 12E-3484             | Schematic Diagram Isolation Condenser System Motor<br>Operated Valves                            | R                      |
| 12E-3506             | Schematic Primary Containment Isolation System Isolation<br>Condenser Control Logic              | AF                     |
| 12E-3507B            | Schematic Primary Containment Isolation System Reactor<br>Inlet Valves 3-1301-1 and 3-1301-4     | O                      |
| 12E-3509B            | Schematic Diagram Primary Containment Isolation System<br>for MOV 1201-2 and 1201-3 Control      | Z                      |
| 12E-3658B            | Wiring Diagram 480V Switchgear Bus 36, Section 364, 365<br>and 366                               | AE                     |
| 12E-3661A            | Wiring Diagram 480V Switchgear Bus 39 Sections 391, 392<br>and 393                               | AE                     |
| 12E-3674D            | Wiring Diagram Reactor Building 480V AC MCC 38-1   | AF                     |
| 12E-3683B            | Wiring Diagram Turbine Building 250V DC MCC-3 Part 2   | J                      |
| 12E-3683C            | Wiring Diagram Turbine Building 250V DC Motor Control<br>Center 3                                | D                      |
| 12E-3684A            | Wiring Diagram Reactor Building 250V DC MCC 3A   | N                      |

## DRAWINGS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>                              | <b><u>Revision</u></b> |
|----------------------|---|------------------------|
| 12E-3684B            | Wiring Diagram Reactor Building 250V DC Motor Control Center 3A | X                      |
| 12E-3684C            | Wiring Diagram Reactor Building 250V DC MCC 3A                  | Y                      |
| 12E-3684E            | Wiring Diagram Reactor Building 250V DC Motor Control Center 3B | M                      |
| 12E-3811B            | Single Line Diagram Uninterruptible Power Supply Panel 903-63   | H                      |
| 12E-7400A            | MOV Limit Switch Development                                    | N                      |
| 203LN001-001         | Low Pressure Coolant (LPCI) System and Instrumentation          | 01                     |
| 2D74383              | Durametallic Corporation, Type "PTO" Dura Seal                  | 01                     |
| 2D74383              | Flowserve Seal Type "PTP"                                       | 05                     |
| CA00728              | Crane-Aloyco Drawing for MOV 3-1301-4                           | B                      |
| ISI-509, Sh 1,2      | System Pressure Test Walkdown Isometric, LPCI Piping            | C                      |
| ISI-559, Sh 1,2      | System Pressure Test Walkdown Isometric, LPCI Piping            | C                      |
| M-20                 | Diagram Reactor Building Closed Cooling Water Piping            | LM                     |
| M-29, SH 1,2         | Diagram of L.P. Coolant Injection Piping                        | CH                     |
| M-359                | Diagram of Isolation Condenser Piping                           | BL                     |
| M-37                 | Diagram of Instrument Air Piping                                | RZ                     |
| M-4319               | MSIV Accumulator 2-220-82 A,B,C, and D Support Upgrade          | A                      |

## MISCELLANEOUS

| <b><u>Number</u></b>      | <b><u>Description or Title</u></b>  | <b><u>Date or Revision</u></b> |
|---------------------------|---|--------------------------------|
|                           | Current Status of Biocide Testing   | 4/28/10                        |
|                           | LPCI System Health Report   | 4Q09                           |
|                           | Rising Stem Margin Report Category 96-05  | 4/13/01                        |
|                           | U2 CCSW System Health Report  | 4Q09                           |
|                           | White Paper on the Safety Classification of ECCS Pump Mechanical Seals (Final)        | 8/26/09                        |
| 0005768038                | Dresden Engineering Memorandum: Thread Engagement                                     | 09/17/98                       |
| 0006050803                | EDG minimum starting air pressure   | 10/27/99                       |
| 041326(CMED)              | HPCI Auxiliary Oil Motor [design analysis minor revision]                             | 000A                           |
| 21365-74D-E509-0164/01-02 | Breaking and Making Test Results  | 01/07/94                       |
| 21365-74D-E509-0234/01-01 | Merlin Gerin Letter Dated March 21, 1994 to Golden Gate Switchboard, FG2 Closing Time | 05/11/94                       |
| 21365-74DQ-E509           | Engineering Specification for 4,160 V Switchgear                                      | 2                              |
| 25355                     | Bingham Pump Co. Pump Curve and Test Data   | 02/02/68                       |

MISCELLANEOUS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>   | <b><u>Date or Revision</u></b> |
|----------------------|--|--------------------------------|
| 4954005              | Dresden Unit 1, 2 and 3 Missing or Partially Engaged Bolts, Studs and Nuts                                     | 05/10/96                       |
| 992C510              | GE Outline (Induction Motor)   | 3                              |
| AIEE Paper           | Short Circuit Calculating Procedure for DC Systems with Motors and Generators                                  | 08/1954                        |
| Analysis 9107        | Laboratory Report: Diesel Fuel – ASTM D 975 1998b  | 04/12/10                       |
| Analysis 9108        | Laboratory Report: Diesel Fuel – ASTM D 975 1998b  | 04/12/10                       |
| Analysis 9109        | Laboratory Report: Diesel Fuel – ASTM D 975 1998b  | 04/12/10                       |
| Analysis 9733        | Laboratory Report: Diesel Fuel – ASTM D 975 1998b  | 02/26/10                       |
| Analysis 9734        | Laboratory Report: Diesel Fuel – ASTM D 975 1998b  | 02/26/10                       |
| CMED-057555          | S&L Parts Classification Generic Position  | 02                             |
| CR#1235              | Certificate of Conformance – Enriched Sodium Pentaborate   | 10/27/06                       |
| D 2007-004           | Instruction Manual for 8" -900lb double disk Gate Valve with Motor Operators                                   | 12/9/94                        |
| D00-4600-B           | SEWS – EDG Primary Gas Air Receiver Unit A1  | 06/25/96                       |
| D00-5202             | OSVS – EDG Day Tank  | 06/25/96                       |
| D00-6601             | SEWS – EDG   | 06/25/96                       |
| D02-2320-GSC         | SEWS – HPCI Gland Seal Condenser   | 05/16/96                       |
| D1315                | GNB Batteries  | 0                              |
| D1336                | 125 VDC Ground Detectors   | 001                            |
| D1622, Volume I      | Solidstate Controls, Inc. Instruction/Technical Manual 200A/125V Charger                                       | 000                            |
| D1622, Volume II     | Solidstate Controls, Inc. Instruction/Technical Manual 200A/250V Charger                                       | 001                            |
| D2/3 MSIV-I          | Safety Related Air Lines for the Inboard MSIV's @ Dresden 2 and 3 (EC 341990 and 341991, Rev 0)                | 03A                            |
| D2/3 MSIV-I          | Safety Related Air Lines for the Inboard MSIV's @ Dresden 2 and 3 (EC 372991, Rev 00)                          | 03B                            |
| D2/3 MSIV-I          | Safety Related Air Lines for the Inboard MSIV's @ Dresden 2 and 3 (EC 374771, Rev 00)                          | 003D                           |
| D2/3 MSIV-I          | Safety Related Air Lines for the Inboard MSIV's @ Dresden 2 and 3 (EC 373027, Rev 00)                          | 003C                           |
| D2015                | Cyberex 35 KVA Uninterruptible Power Supply  | 001                            |
| D-93-003-0858-00     | Part Evaluation – LPCI Mechanical Seal   | 05/26/93                       |
| DTR 3081 – AMH       | Report of Design Tests on CBSI AMHG, 350 MVA, 1200A and 2000A Breakers and Switchgear                          | 2                              |
| EC 370787            | CCSW Flow Rates Through The Unit 3 Div II LPCI/CCSW Hx When Maintaining a Higher Pressure Than The LPCI System | 0                              |
| EC 371152            | NRC GL 2008-01 Dresden LPCI System Evaluation to Support Response to NRC GL-2008-01                            |                                |

MISCELLANEOUS

| <b><u>Number</u></b>  | <b><u>Description or Title</u></b>   | <b><u>Date or Revision</u></b> |
|-----------------------|--|--------------------------------|
| EC 372712             | Dresden CCSW System Evaluation To Support Response to Industry Information   | 0                              |
| EC 376561             | Engineering Evaluation – Safety Classification of LPCI Pump Shaft Seals  | 08/11/09                       |
| GEH-2614F             | GE Installation and Maintenance Instructions 7700 Line Motor Control Center  | 6-81 5M                        |
| GE-NE-A22-00103-52-01 | Project Task Report, Dresden and Quad Cities Extended Power Uprate, Task T0606: Reactor Building Closed Cooling Water (RBCCW) System Evaluation            | 0                              |
| GES-6103F             | Molded Case Circuit Breaker F225 Line Time-Current Curves  | 01.04                          |
| IN 95-55              | Inadequate NPSH of Emergency Core Cooling and Containment Heat Removal Pumps Under Design Basis Accident Conditions  | 10/22/96                       |
| K-2204                | Sargent and Lundy Specification for Indoor Motor Control Centers for 440V Auxiliaries  | 12/16/96                       |
| ME P2-F12             | Component Information and Check Lists  | 0                              |
| NLI-TECH-P110         | Remanufacturing of Circuit Breaker Systems, Golden Gate Switchboard and/or Pacific Breaker Systems AMHG Replacement Breakers                               | 2                              |
| Project 8900-71       | Bus Transfer at Dresden and Quad Cities Stations   | 07/23/91                       |
| PTR 3081              | Production Test AMH Replacement Circuit Breaker 5kV, 350 MVA, 1200 and 2000A   | 11                             |
| QP 2010-3081-3        | Commercial Grade Dedication Requirements for AMH Replacement Circuit Breakers  | 14                             |
| RS-05-114             | Exelon Letter to NRC Additional Information Supporting the Request for License Amendment Related to Alternate Source Terms                                 | 8/22/05                        |
| SL-4500               | Overcurrent Protective Device Coordination Study Dresden Station - Units 2 and 3, Volume 1, Medium-Voltage Relay Coordination                              | 03/24/89                       |
| SP 95-1-11            | Modification Test for Bus 23 Circuit Breaker and Stationary Switch Replacement – Bus 23 Main Feed from Transformer 21 and Reserve Feed from Transformer 22 | 0                              |
| SPII 95-09-12         | Modification Test for Bus 24 Circuit Breaker and Stationary Switch Replacement – Bus 24 Main Feed from Transformer 21 and Reserve Feed from Transformer 22 | 0                              |
| WO 00642579           | Master-Lee, Eddy Current Examination Final Report November 2007  | 2                              |

## MODIFICATIONS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>  | <b><u>Date or Revision</u></b> |
|----------------------|---|--------------------------------|
| EC 347808            | Modify Fuel Oil System On Diesel Generator To Allow For Flex Hose-U2 And U2/3                               | 03/11/04                       |
| EC 350135            | Change Boron Enrichment In SLC  | 09/26/06                       |
| EC 376404            | Install A Supplemental Chemical Injection System To Inject Biocide Chemical Into CCSW Keep Fill Lines ..... | 001                            |
| EC 377462            | Evaluate UT Thickness Readings For U2 SLC Tank  | 10/26/09                       |
| M12-0-91-019D        | Bus 23 Station Blackout Tie-In and 4kV Enhancement  | 09/29/94                       |

## OPERABILITY EVALUATIONS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>   | <b><u>Date or Revision</u></b> |
|----------------------|--|--------------------------------|
| 07-006               | Operability Evaluation For Over-Thrust Condition On U3 Isolation Condenser System And Inboard Conondensate Return MOV 3-1301-4 | 11/13/07                       |
| EC 377021            | 2A LPCI Heat Exchanger Operability Evaluation  | 001                            |
| EC379048             | U2 and U3 HPCI Lube Oil Cooler and Gland Seal Condenser Post LOCA Flow   | 02/26/10                       |

## PROCEDURES

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>   | <b><u>Revision</u></b> |
|----------------------|--|------------------------|
| CC- AA-304           | Component Classification   | 5                      |
| CY-DR-110-220        | LPCI Service Water (CCSW) and Torus Water Sampling   | 6                      |
| CY-DR-120-413        | Cooling Service Water Chemical Injection   | 09                     |
| CY-DR-130-9314       | Clam-trol Biocide (Spectrus 1300) Utilizing Hach DR/2000 or DR/2800                              | 0                      |
| DAP 15-15            | Part Selection Process   | 8                      |
| DCP 1008-04          | Heat Exchanger Inspection Program  | 07                     |
| DEOP 100             | RPV Control  | 10                     |
| DEOP 200-1           | Primary Containment Control  | 10                     |
| DEOP 400-5           | Failure to Scram   | 15                     |
| DES 6700-09          | Inspection and Maintenance of General Electric MC-4.76 Horizontal Draw-Out Metal-Clad Switchgear | 16                     |
| DES 8300-07          | Unit 2 (3) Weekly Station Battery Inspection   | 20                     |
| DGA-13               | Loss of 125 Vdc Battery Chargers with Simultaneous Loss of Auxiliary Electrical Power            | 16                     |
| DMP 0200-43          | Main Steam Isolation Valve Operator Air and Oil Cylinder Maintenance                             | 8                      |
| DMP 0200-44          | Main Steam Isolation Valve Pilot Valve Maintenance   | 10                     |
| DMS 1100-01          | Standby Liquid Control Relief Valve Testing And Surveillance                                     | 15                     |



## PROCEDURES

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>  | <b><u>Revision</u></b> |
|----------------------|---|------------------------|
| DOA 0040-02          | Localized Flooding in Plant   | 22                     |
| DOA 0600-01          | Transient Level Control   | 48                     |
| DOA 3700-1           | Loss Of Cooling By Reactor Building Closed Cooling Water (RBCCW) System   | 17                     |
| DOA 3700-2           | Reactor Building Closed Cooling Water System Operation  | 35                     |
| DOA 4700-01          | Instrument Air System Failure   | 39                     |
| DOA 6900-02          | Failure of Unit 2 125 Vdc Power Supply  | 18                     |
| DOP 0040-01          | Station Motor Operated Valve Operations   | 33                     |
| DOP 1200-02          | RWCU System Blowdown  | 26                     |
| DOP 1300-02          | Automatic Operation of Isolation Condenser  | 23                     |
| DOP 1500-02          | Torus Water Cooling Mode of LPCI  | 60                     |
| DOP 4700-05          | Cross-Connect Unit 1 Instrument Air to Unit2 Instrument Air System  | 6                      |
| DOP 6500-04          | Racking Out 4160 Volt Manually Operated Air Circuit Breaker (ACB), Magne-Blast Hybrid (AMHG) or SF6 Gas Circuit Breaker (GCB) and to Canal Cooling Tower 5 kV Rated Vacuum Contactors | 46                     |
| DOP 6500-07          | Racking In 4160 Volt Manually Operated Air Circuit Breaker (ACB)  | 60                     |
| DOP 6900-06          | 125 VDC Ground Detection  | 29                     |
| DOP 6900-08          | Unit2 – 125Vdc Battery System Restoration   | 9                      |
| DOS 0010-16          | Unit 2(3) Isolation Condenser Safe Shutdown Valve Operability   | 24                     |
| DOS 110-04           | Standby Liquid Control System Quarterly/Comprehensive Pump Test for the In-service Testing (IST) Program  | 42                     |
| DOS 1300-02          | Isolation Condenser Valve Operability Check   | 17                     |
| DOS 1600-05          | UNIT 3 Quarterly Valve Timing (W-9)   | 42                     |
| DOS 1600-05 (U3)     | Valve Test Acceptance Criteria Sheet  | 09/17/09               |
| DOS 6600-14          | Diesel Oil Transfer Pump Operation And Fuel Consumption Test  | 15                     |
| DSSP 0100-CR         | Hot Shutdown Procedure – Control Room Evacuation  | 42                     |
| ENC-QE-06            | Design Modifications  | 6                      |
| ENC-QE-70            | Procurement and Use of Items for Repair and Replacement of Safety Related Equipment   | 1                      |
| ER-AA-302-1001       | MOV Rising Stem MOV Thrust and Torque Sizing and Set-up Window Determination Methodology  | 6                      |
| ER-AA-310            | Implementation Of Maintenance Rule  | 6                      |
| ER-AA-340-1002       | Service Water Heat Exchanger Guide  | 4                      |
| MA-AA-723-325        | Molded Case Circuit Breaker Testing   | 8b                     |

## PROCEDURES

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>   | <b><u>Revision</u></b> |
|----------------------|--|------------------------|
| MA-AB-725-117        | Preventive Maintenance and Receipt Inspection on Merlin Gerin SF6 4KV Type AMHG Circuit Breakers                       | 10                     |
| MA-DR-725-113        | Inspection and Maintenance of General Electric 4KV Magne-Blast Circuit Breakers Types AMH4.76-250 (Horizontal Drawout) | 3                      |
| SM-AA-1005           | MOV Design Database Control and Design Data Sheet Activities   | 4                      |
| SM-AA-1007           | MOV Limitorque Actuator Capability Determination Methodology   | 5                      |
| SM-AA-300            | Procurement Engineering Support Activities   | 6                      |
| SM-AA-300-1002       | BOM Development and Right Parts Selection for Maintenance  | 4                      |

## SURVEILLANCES (COMPLETED)

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>                      | <b><u>Date or Revision</u></b> |
|----------------------|---|--------------------------------|
| WO 00565281          | 6Y PM EDG Inspection                                    | 05/19/09                       |
| WO 00565281          | Open, Inspect, And Clean The 2/3 EDG Heat Exchanger A/B | 04/13/09                       |
| WO 00633776          | HPCI Gland Seal Condenser Eddy Current Test             | 12/12/07                       |
| WO 00644121          | Open, Inspect, And Clean The 2 EDG Heat Exchanger A     | 09/07/09                       |
| WO 00679588          | Open, Inspect, And Clean The 3 EDG Heat Exchanger A     | 01/24/06                       |
| WO 00748995          | Isolation Condenser Safe Shutdown Valve Operability     | 06/27/06                       |
| WO 00792697          | Open, Inspect, And Clean The 2 EDG Heat Exchanger A/B   | 02/13/07                       |
| WO 00847007          | Measure Airflow, Fan Amps, Etc. For Unit 3 EDG          | 01/27/06                       |
| WO 00889893          | Open, Inspect, And Clean The 3 EDG Heat Exchanger A     | 01/23/08                       |
| WO 00909290          | Open, Inspect, And Clean The 2/3 EDG Heat Exchanger A/B | 03/26/07                       |
| WO 00911669          | Open, Inspect, And Clean The 2/3 EDG Heat Exchanger A/B | 03/24/08                       |
| WO 00934291          | Isolation Condenser Safe Shutdown Valve Operability     | 12/28/07                       |
| WO 00975566          | MSIV Leak Test  | 11/24/08                       |
| WO 00977606          | MSIV Leak Test  | 11/04/08                       |
| WO 01002283          | Fuel Consumption Test                                   | 03/10/09                       |
| WO 01016086          | Fuel Consumption Test                                   | 05/09/09                       |
| WO 01022783          | MM Repair Leak In Head Cylinder Gasket                  | 10/15/07                       |
| WO 01077723          | MSIV Leak Test  | 11/03/09                       |
| WO 01081285          | MSIV Leak Test  | 11/02/09                       |
| WO 01093099          | D3 18M TSTR Isolation Condenser Valve Operability Check | 05/06/09                       |
| WO 01136214          | 2Y PM EDG Inspection                                    | 04/01/10                       |
| WO 01152490          | MSIV Leak Test  | 11/11/09                       |
| WO 01233951          | D2/3 TS EDG Fast Start Operability Surveillance         | 11/02/09                       |
| WO 01234856          | D2/3 TS Unit EDG Operability                            | 06/03/09                       |

SURVEILLANCES (COMPLETED)

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>                                  | <b><u>Date or Revision</u></b> |
|----------------------|---|--------------------------------|
| WO 01245578          | SLC Quarterly/Comprehensive Pump Test – IST                         | 09/16/09                       |
| WO 01272300          | SLC Quarterly/Comprehensive Pump Test – IST                         | 11/28/09                       |
| WO 01280282          | Replace Flexible Hoses On The 2/3 EDG Jacket Water System           | 04/01/10                       |
| WO 01289106          | D2/3 TS EDG Operability   | 12/23/09                       |
| WO 01290691          | 1M TS SLC Tank Boron Concentration                                  | 12/30/09                       |
| WO 01290709          | SLC Quarterly/Comprehensive Pump Test – IST                         | 03/17/10                       |
| WO 01294923          | D3 Qtr Ts Valve Timing (Ist)  | 01/14/10                       |
| WO 01298768          | 1m Ts Slc Tank Boron Concentration                                  | 02/03/10                       |
| WO 01299407          | D2/3 Ts Edg Operability   | 01/18/10                       |
| WO 01303693          | D2/3 TS Unit EDG Operability  | 02/22/10                       |
| WO 01307305          | 1M TS SLC Tank Boron Concentration                                  | 03/03/10                       |
| WO 01313130          | D2/3 TS EDG Operability   | 03/28/10                       |
| WO 01314723          | 1M TS SLC Tank Boron Concentration                                  | 03/31/10                       |
| WO 01867056          | MM Repack 2B SBLC Pump  | 04/22/09                       |
| WO 1102337-01        | Open, Inspect, And Clean The 3 EDG Heat Exchanger A                 | 01/25/10                       |
| WO 1118985-01        | Open, Inspect, And Clean The 2/3 EDG Heat Exchanger A               | 03/29/10                       |
| WO 1120020-01        | Open, Inspect, And Clean The 2/3 EDG Heat Exchanger B               | 03/29/10                       |
| WO 01319914          | D3 Weekly Tech Spec 125 VDC Battery Surveillance                    | 03/25/10                       |
| WO 01323531          | D3 Weekly Tech Spec 125 VDC Battery Surveillance                    | 04/08/10                       |
| WO 01325637          | D3 Weekly Tech Spec 125 VDC Battery Surveillance                    | 04/15/10                       |
| WO 01268875          | D3 Monthly Tech Spec 125 VDC Station Battery Inspection             | 10/23/09                       |
| WO 01303967          | D3 Monthly Tech Spec 125 VDC Station Battery Inspection             | 02/19/10                       |
| WO 01311452          | D3 Monthly Tech Spec 125 VDC Station Battery Inspection             | 03/19/10                       |
| WO 01232035          | D3 Quarterly Tech Spec 125 VDC Station Battery Surveillance         | 07/30/09                       |
| WO 01256128          | D3 Quarterly Tech Spec 125 VDC Station Battery Surveillance         | 10/03/09                       |
| WO 01281955          | D3 Quarterly Tech Spec 125 VDC Station Battery Surveillance         | 01/22/10                       |
| WO 00833359          | D3 Annual Tech Spec 125 VDC Main Station Battery Surveillance       | 04/29/10                       |
| WO 01028121          | D3 Annual Tech Spec 125 VDC Main Station Battery Surveillance       | 04/21/08                       |
| WO 00342413          | D3 24 Month Tech Spec 125 V Battery Service Test                    | 01/21/03                       |
| WO 00834554          | D3 5 Years Tech Spec 125V Station Battery Modified Performance Test | 05/26/09                       |
| WO 00916784          | D3 24 Month Tech Spec 125 V Battery Charger 3, 4 Hour Load Test     | 04/23/08                       |

# WORK DOCUMENTS

| <b><u>Number</u></b> | <b><u>Description or Title</u></b>                        | <b><u>Date or Revision</u></b> |
|----------------------|---|--------------------------------|
| WO 00364144          | 5Y PM Inspect 4KV BKR UTC 0001185094                      | 10/18/05                       |
| WO 00422001          | Replace Unit 3 HPCI Aux Oil Pump Motor                    | 01                             |
| WO 00479793          | 4Y PM Inspect 4KV BKR UTC 0000874011                      | 07/26/07                       |
| WO 00548808          | Replace A LPCI Pump Mechanical Seal                       | 1                              |
| WO 00555038          | D2 4Y PM Test 4KV Bus 23-1 to 2A LPCI PP Relays           | 03/05/07                       |
| WO 00563348          | D2 6Y PM Insp 480V MCC, 2A DW and Torus Purge Exh Fan     | 08/24/09                       |
| WO 00619755          | 5Y PM Inspect 4KV BKR UTC 0000997121                      | 08/20/09                       |
| WO 00634918          | D2 2RFL PM Test 4KV Bus 23 Feed to Bus 23-1 Relays/Meters | 11/09/07                       |
| WO 00687190          | 4Y PM Inspect 4KV BKR UTC 0001285082                      | 03/19/07                       |
| WO 00690162          | D2 4RFL EQ 480V MCC 28-1 Surveillance                     | 11/01/07                       |
| WO 00975030          | RWCU 3-1201-2 Valve LLRT Exceded Admin Alarm Limit        | 4/28/08                        |
| WO 01073676          | D2 18M TS Bus 23-1 Degraded Voltage Relay Calibration     | 04/24/09                       |
| WO 99053282          | D2 6RFL PM Clean/Insp Bus 23-1 Insul/Joints/Sprt/wiring   | 11/08/07                       |
| WO 99063433          | 16YR PM Overhaul 4KV BKR UTC 0000873996                   | 09/28/07                       |
| WO 99181166          | MOV Diagnostic Testing (2-3706 Rev)                       | 1/28/09                        |

## LIST OF ACRONYMS USED

|       |  |
|-------|--|
| AC    | Alternating Current                            |
| ADAMS | Agencywide Document Access Management System   |
| AIEE  | American Institute of Electrical Engineers     |
| AR    | Action Request                                 |
| ASME  | American Society of Mechanical Engineers       |
| ATWS  | Anticipated Transient Without Scram            |
| CCSW  | Component Cooling Service Water                |
| CDBI  | Component Design Bases Inspection              |
| DGCW  | Diesel Generator Cooling Water                 |
| EDG   | Emergency Diesel Generator                     |
| GL    | Generic Letter                                 |
| HPCI  | High Pressure Coolant Injection                |
| Hx    | Heat Exchanger                                 |
| IEEE  | Institute of Electrical & Electronic Engineers |
| IMC   | Inspection Manual Chapter                      |
| IN    | Information Notice                             |
| IP    | Inspection Procedure                           |
| IR    | Inspection Report                              |
| kV    | Kilovolt                                       |
| LPCI  | Low Pressure Coolant Injection                 |
| MOV   | Motor-Operated Valve                           |
| NCV   | Non-Cited Violation                            |
| NPSH  | Net Positive Suction Head                      |
| NRC   | U.S. Nuclear Regulatory Commission             |
| PARS  | Publicly Available Records                     |
| PRA   | Probabilistic Risk Assessment                  |
| RAT   | Reserve Auxiliary Transformer                  |
| RBCCW | Reactor Building Closed Cooling Water          |
| RCA   | Radiologically Controlled Area                 |
| RIS   | Regulatory Issue Summary                       |
| RWCU  | Reactor Water Cleanup                          |
| RWP   | Radiation Work Permit                          |
| SLC   | Standby Liquid Control                         |
| SBO   | Station Blackout                               |
| SDP   | Significance Determination Process             |
| SSC   | Structures, Systems, and Components            |
| TS    | Technical Specification                        |
| UAT   | Unit Auxiliary Transformer                     |
| UFSAR | Updated Final Safety Analysis Report           |
| URI   | Unresolved Item                                |
| Vac   | Volts Alternating Current                      |
| Vdc   | Volts Direct Current                           |
| WO    | Work Order                                     |

C. Pardee

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Sincerely,

/RA/

Ann Marie Stone, Chief  
Engineering Branch 2  
Division of Reactor Safety

Docket Nos. 50-237; 50-249  
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