UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

December 22, 2010

Mr. Michael J. Pacilio
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO), Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNIT 3 NRC POST-APPROVAL SITE INSPECTION FOR LICENSE RENEWAL INSPECTION REPORT 05000249/2010010

Dear Mr. Pacilio:

On November 19, 2010, the U.S. Nuclear Regulatory Commission (NRC) completed Post-Approval Site Inspection for License Renewal at your Dresden Nuclear Power Station, Unit 3. The enclosed report documents the results of this inspection, which were discussed on November 19, 2010, with Mr. T. Hanley, 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, one NRC-identified finding of very low safety significance was identified. The finding involved a violation of NRC requirements. However, because of its very low safety significance, and because the issue was entered into your corrective action program, the NRC is treating the issue as a Non-Cited Violation (NCV) in accordance with Section 2.3.2 of the NRC Enforcement Policy.

If you contest the subject or severity of this NCV, 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 cross-cutting aspect assigned to 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.

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 document system (ADAMS). ADAMS is accessible from the NRC Website 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. 50-249
License Nos. DPR-25

Enclosure: Inspection Report 05000249/2010-010
w/Attachment: Supplemental Information

cc w/encl: Distribution via ListServ

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos:	05000249
License Nos:	DPR-25
Report No:	05000249/2010-010
Licensee:	Exelon Generation Company, LLC
Facility:	Dresden Nuclear Power Station, Unit 3
Location:	Morris, IL
Dates:	October 18, 2010 – November 19, 2010
Inspectors:	S. Sheldon, Senior Reactor Engineer (Lead) T. Bilik, Senior Reactor Engineer G. O'Dwyer, Reactor Engineer M. Jones, Reactor Engineer E. Sanchez, Reactor Engineer
Approved by:	A. M. Stone, Chief Engineering Branch 2 Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000249/2010010; 10/18/2010 – 11/19/2010; Dresden Nuclear Power Station, Unit 3; Post-Approval Site Inspection for License Renewal.

The report covers a team inspection conducted by region-based engineering inspectors. The inspectors concluded that commitments, license conditions, and regulatory requirements associated with the issuance of the renewed operating license were being met. One Green finding was identified by the inspectors. The finding was considered a Non-Cited Violation (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: Barrier Integrity

- Green. A finding of very low safety-significance (Green) and associated NCV of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the failure to accomplish activities affecting quality in accordance with procedures. Specifically, the licensee non-destructive examination (NDE) examiner failed to perform an Ultrasound Thickness Measurement of the drywell liner in accordance with procedures. The licensee initiated corrective action document AR 01141740 to address the issue.

  The finding was determined to be more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically by failing to perform an adequate Ultrasound Thickness Measurement of the drywell liner potential degradation could have gone undetected. This finding is of very low safety-significance (Green) because the inspectors answered no to all of the characterizations worksheet questions in Table 4a of MC 0609.04. The inspectors determined this finding had no associated cross-cutting aspect because none of them represented the underlying cause for this violation to occur. (Section 4OA5.1)

B. Licensee-Identified Violations

No violations of significance were identified.

REPORT DETAILS

4. OTHER ACTIVITIES

4OA5 Other Activities

.1 Post-Approval Site Inspection for License Renewal (Phases I and II) – IP 71003

The purpose of this inspection is to verify that committed actions and license conditions associated with the renewed license for Unit 3 are implemented in accordance with 10 CFR Part 54. Inspection Report 05000237/2009007 (ADAMS ascension number ML093570258) documented the inspectors' review of the licensee's actions associated with the renewed Unit 2 license. Because several of these actions involve common programs, the Unit 2 report is referenced where appropriate.

a. Inspection Scope

(1) Review of Newly Identified SSCs

The inspectors discussed the identification of new systems structures and components, under the purview of 10 CFR 54.37(b), with the licensee's license renewal staff. The licensee personnel indicated that no components had been identified that should have been within the scope of its license renewal program due to discovering components in the plant that were not accurately reflected in the database used to originally generate the application for a renewed license. The inspectors did not identify any deficiencies.

The inspectors contacted the Office of Nuclear Reactor Regulation, Division of License Renewal (NRR/DLR) staff for information on any generic NRC communications naming newly identified systems, structures, and components. The Office of Nuclear Reactor Regulation Division of License Renewal NRR/DLR staff advised the inspectors that the NRC has not generically specified newly identified systems, structures, and components beyond those referenced in Regulatory Issue Summary RIS 2007-16, Revision 1. The SSCs referenced in RIS 2007-16 were reviewed as part of Dresden's application.

(2) Review of Updated Final Safety Analysis Report (UFSAR) and Commitment Item Change Process

As part of reviewing the Aging Management Programs (AMPs) associated with the commitments, the inspectors reviewed the UFSAR descriptions to confirm the implemented programs were consistent with the UFSAR descriptions. Some minor disparities were noted in programs that had been implemented where the UFSAR said they "would be" implemented. The licensee initiated AR 01131093 to update the UFSAR.

The inspectors reviewed the licensee's procedures to ensure that Commitment Item revisions would follow the guidance in NEI 99-04, Guidelines for Managing NRC Commitment Item Changes, including the elimination of commitments, and would properly evaluate, report, and approve changes to license renewal commitments listed in the UFSAR in accordance with 10 CFR 50.59. The inspectors also reviewed the licensee's Commitment Item tracking program to evaluate its effectiveness.

With respect to implementation, the inspectors reviewed changes associated with each commitment. No disparities were identified as detailed below.

(3) Review of Commitments

The inspectors reviewed supporting documents including completed surveillance records, conducted interviews, performed visual inspection of structures and components including those not accessible during power operation, and observed the activities described below to verify the licensee completed the necessary actions to comply with the license conditions that are a part of the renewed operating license. The inspectors verified the licensee implemented the Aging Management Programs and time-limited aging analyses (TLAA) included in NUREG-1796, "Safety Evaluation Report (SER) Related to the License Renewal of the Dresden Nuclear Power Station, Units 2 and 3 and Quad Cities Nuclear Power Station, Units 1 and 2," in accordance with Title 10 of the Code of Federal Regulations (CFR) Part 54, "Requirements for the Renewal of Operating Licenses for Nuclear Power Plants." The inspectors verified a selected sample of corrective actions taken to address issues identified in the Unit 2 license renewal inspection, which is documented in Inspection Report 05000237/2009007.

When changes to these commitments were identified, the inspectors reviewed the Commitment Item Change Evaluation Form (CCEF) to verify the licensee followed the guidance in NEI 99-04 for the license renewal Commitment Item change process, including the elimination of commitments, and properly evaluated, reported, and approved where necessary, changes to license renewal commitments listed in the UFSAR in accordance with 10 CFR 50.59.

The inspectors reviewed the commitments listed below which are referenced to Appendix A of the SER. Specific documents reviewed are listed in the enclosure.

1. Item 1, ASME Code, Section XI Inservice Inspection, Subsections IWB, IWC, and IWD

Commitment Item 1 specified that the existing ASME Section XI, Inservice Inspection, Subsections IWB, IWC, and IWD Aging Management Program is part of the Inservice Inspection (ISI) Program. It provides identification of signs of degradation, and establishment of corrective actions for condition monitoring of reactor coolant pressure retaining piping and components within the scope of license renewal.

The inspectors reviewed the licensing basis, program basis documents, implementing procedures, non-destructive examination (NDE) records, and related condition reports (CRs); and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 1.

2. Item 2, Water Chemistry

Commitment Item 2 specified that the existing water chemistry program was credited for license renewal and that the program would be enhanced prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 licensing renewal inspection and ensured that the program remained effective for both units. The inspectors verified that planned and completed chemistry surveillance tests and related CRs demonstrated that the water chemistry program was appropriately applied to Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 2.

3. Item 3, Reactor Head Closure Studs

Commitment Item 3 specified that the existing Reactor Head Closure Studs Aging Management Program provided for condition monitoring and preventive activities to manage stud cracking. The program is implemented through station procedures based on the examination and inspection requirements specified in ASME Section XI, Table IWB-2500-1 and preventive measures described in Regulatory Guide 1.65, "Materials and Inspection for Reactor Vessel Closure Studs." The reactor head studs at Dresden are not metal plated and have had manganese phosphate coatings applied.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors interviewed the plant personnel responsible for the program and reviewed the program bases documents, implementing procedures, work orders, and related ARs to verify the program is being implemented on Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 3.

4. Item 4, BWR Vessel ID Attachment Welds

Commitment Item 4 specified that the existing BWR Vessel Attachment Welds Aging Management Program activities incorporated the inspection and evaluation recommendations of BWRVIP-48, 'Vessel 10 Attachment Weld Inspection and Evaluation Guidelines," as well as the water chemistry recommendations of EPRI TR-103515-R2, "BWR Water Chemistry Guidelines."

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis documents, implementing procedures, NDE examination records, and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3. The inspectors verified the implementation of the recommendations of report GE-NE-523-A71-0594-A, Revision 1, which was approved by the NRC staff.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 4.

5. Item 5, BWR Feedwater Nozzle

Commitments Item 5 specified that the existing BWR Feedwater Nozzle program was credited for license renewal and would be enhanced prior to the period of extended

operation. This program implemented enhanced inservice inspection in accordance with the ASME Code for the feed water nozzles.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis documents, implementing procedures, NDE examination records, and related CRs; and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3. The inspectors verified that the licensee implement the recommendations of report GE-NE-523-A71-0594-A, Revision 1, which was approved by the NRC staff.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 5.

6. Item 6, Control Rod Drive Return Line Nozzle

Commitment Item 6 specified that the existing BWR Control Rod Drive Return Line Nozzle inspection program was credited for license renewal. This program implemented enhanced inservice inspection in accordance with the ASME Code for the control rod drive return line nozzles.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the program basis documents, procedures, and NDE examination records to verify that the program was adequately implemented for Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 6.

7. Item 7, BWR Stress Corrosion Cracking (SCC)

Commitment Item 7 specified that the existing BWR SCC Program was credited for license renewal. The BWR SCC Program is credited for managing the aging affects of crack initiation and growth, loss of fracture toughness, and loss of material in susceptible components.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis document, implementing procedures, weld examination records, and related ARs; and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 7.

8. Item 8, BWR Penetrations

Commitment Item 8 specified that the existing BWR reactor vessel penetration inspection program was credited for license renewal. This program implemented inspection and flaw evaluation in conformance with BWRVIP-27 and BWRVIP-49.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the program basis documents, procedures, and NDE examination records to verify that the program was adequately implemented for Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 8.

9. Item 9, BWR Vessel Internals

Commitment Item 9 specified that the ASME inservice inspection program inspections would be enhanced with inspections consistent with BWRVIP-48. The BWR Vessel internals Aging Management Program mitigates the effect of stress corrosion cracking, intergranular stress corrosion cracking (IGSCC), and irradiation assisted stress corrosion cracking in reactor pressure vessels internals through water chemistry activities that are implemented through station procedures and are consistent with the guidelines of EPRI TR-103515-R2, BWR Water Chemistry Guidelines, 2000 Revision. The program also manages cracking of reactor of reactor pressure vessel internals through condition monitoring activities that consist of examinations and the BWRVIP guidelines, as well as the requirements of ASME Section XI. The program has also been enhanced by NRC approved BWRVIP Steam Dryer Inspection and Evaluation Guidelines.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis documents, implementing procedures, NDE examination records; and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3.

The licensee implemented Commitment Item change to update the scope this program to reflect the use of EPRI 1016579, “BWR Water Chemistry Guidelines”, and BWRVIP-190, “BWR water Vessel and Internals Project, BWR Water Chemistry Guidelines 2008 Revision,” EPRI Report 1016579 instead of EPRI TR-103515-R2, “BWR Water Chemistry Guidelines,” 2000 Revision.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 9.

10. Item 10, Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS)

Commitment Item 10 specified that a new Aging Management Program was to be implemented for thermal aging and neutron irradiation embrittlement of CASS reactor internal components within the scope of license renewal, to ensure the integrity of the CASS components exposed to the high temperature and neutron fluence present in the reactor environment. This program includes a specific evaluation of the loss of fracture toughness. For those components where the loss of fracture toughness may affect function of the component, an enhanced VT-1 inspection will be conducted for those components where flaws have been detected. These inspections will be in accordance with BWRVIP-03, and will be performed as part of the ISI program.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the

licensing basis, program basis documents, implementing procedures, and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 10.

11. Item 11, Flow Accelerated Corrosion (FAC)

Commitment Item 11 specified that the existing FAC Program was credited for license renewal with enhancements to include portions of the main steam and the reactor vessel head vent systems prior to the period of extended operation. The FAC Program is credited for predicting, detecting, and monitoring for loss of material by wall thinning in piping, fittings, and valve bodies due to FAC.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis document, implementing procedures, pipe examination records, and related ARs; and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 11.

12. Item 12, Bolting Integrity

Commitment Item 12 specified that the existing bolting integrity program was credited for license renewal and that the program would be enhanced prior to the period of extended operation. The Bolting Integrity Program was an existing program that consisted of the preventive and condition monitoring of pressure retaining bolted joints for piping and components for age-related degradation to discover and correct conditions that could lead to a loss of intended function.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 inspection and ensured that the program remained effective for both units. The inspectors reviewed the licensing basis, the Bolting Integrity Program basis documentation, implementing procedures, planned, and completed work orders for Unit 3, related corrective action documents, and interviewed personnel responsible for the program regarding these documents to verify that the program was adequately implemented for Unit 3. The inspectors reviewed records of the isolation condenser shell to tube bundle flange VT-3 inspection. No issues were identified.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 12.

13. Item 13, Open-Cycle Cooling Water Program

Commitment Item 13 specified that the existing open-cycle cooling program was credited for license renewal and that the program would be enhanced, prior to the period of

extended operation, to include periodic inspections of additional heat exchangers and sub-components, external surfaces of various submerged pumps, components in the high humidity/moisture environments of the pump vaults and piping, and strainer internals in the component cooling service water (CCSW) supply line to the main control room heating, ventilation and air conditioning (HVAC) system.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis document, planned and completed work orders, Issue Reports, and inspection procedures to verify the program is being implemented on Unit 3. The inspectors observed eddy current testing on the 3B Low Pressure Coolant Injection (LPCI) Heat Exchangers and the as-found inspection of the 3B LPCI room cooler. In addition the inspectors reviewed documents and records of the 3A LPCI room coolers eddy urrent inspection and the cleaning of the 3B LPCI room coolers. No issues were identified.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 13.

14. Item 14, Closed-Cycle Cooling Water Chemistry

Commitment Item 14 specified that the existing closed-cycle cooling water chemistry program was credited for license renewal and that the program would be enhanced prior to the period of extended operation to be consistent with EPRI guidance.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis document, implementing procedures, chemistry results, and related ARs; and interviewed the plant personnel responsible for the program regarding these documents procedures to verify the program is being implemented on Unit 3. The licensee implemented a Commitment Item change to incorporate requirements from the latest EPRI guidance document, EPRI TR 1007820, "Closed Cooling Water Chemistry Guideline," Revision 1. The inspectors verified that this change was appropriate.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 14.

15. Item 15, Overhead Heavy Load and Light Load (Related to Refueling) Handling Systems

Commitment Item 15 specified that the existing inspection of overhead heavy load and light load (related to refueling) handling systems program was credited for license renewal and that the program would be enhanced prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007.

The inspectors reviewed the overhead heavy load and light load (related to refueling) handling systems program as applied to Unit 3. The inspectors reviewed the licensing basis, the program basis documentation, changes to the program that occurred after the

Unit 2 inspection, implementing procedures, planned and completed work orders, related corrective action documents, and interviewed personnel responsible for the program regarding these documents. The inspectors verified that planned and completed work orders and related CRs demonstrated that the overhead heavy load and light load (related to refueling) handling systems program was applied appropriately to Unit 3.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 15.

16. Item 16, Compressed Air Monitoring

Commitment Item 16 specified that the existing compressed air monitoring program was credited for license renewal and that the program would be enhanced prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis document, implementing procedures, scheduled and completed work orders, and EPRI TR-108147 procedures to verify the program is being implemented on Unit 3.

Based on review of the timeliness and adequacy of the licensee's actions the inspectors determined that the licensee met Commitment Item 16.

17. Item 17, BWR Reactor Water Cleanup System

Commitment Item 17 specifies that the existing program is credited for license renewal and is consistent with the NUREG-1801 "Generic Aging Lessons Learned (GALL)."

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors determined that no further review was required for Unit 3.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 17.

18. Item 18, Fire Protection

Commitment Item 18 specified that the licensee would enhance the existing fire protection program as follows:

- Provide specific guidance to check fire doors for wear and holes in skin that could affect intended function during weekly tours.
- Inspection of external surfaces of the Halon system and carbon dioxide system.
- Periodic capacity tests of the isolation condenser makeup pumps.
- Specific fuel supply leak inspection criteria for fire pumps and isolation condenser makeup pumps during testing.
- Inspection frequencies for fire doors and spill barriers will be provided.
- Perform a visual inspection (VT-1 or equivalent) on a 10 percent sample population of each type of fire seal on a refueling outage frequency. Expand the sample population by 10 percent if any of the inspected seals are found to have

abnormal degradation that could prevent the seal from performing its intended function.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the program basis documents, and revised implementing procedures and determined that the program was not unit specific. The inspectors verified that the procedure revisions addressed the minor issues identified in Inspection Report 05000237/2009007, and did not negatively affect other aspects of the program.

Based on the review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 18.

19. Item 19, Fire Water System

Commitment Item 19 specified that the existing fire water system program was credited for license renewal and that the program would include several enhancements prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 inspection and ensured that the program remained effective for both units. The inspectors verified that planned and completed work orders and related CRs demonstrated that the fire water system program was appropriately applied to Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 19.

20. Item 20, Above-ground Carbon Steel Tanks

Commitment Item 20 specified that the existing above-ground carbon steel tanks program was credited for license renewal and that the program would be enhanced prior to the period of extended operation.

The enhancements included periodic system engineer walkdowns on the nitrogen storage tanks utilizing stand alone procedures, periodic internal/external inspections of the aluminum storage tanks, and periodic UT thickness inspections of the tank bottoms.

Program requirements and inspections for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. As the tanks are common to both units, the inspectors determined that these activities reviewed were also adequate for Unit 3.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 20.

21. Item 21, Fuel Oil Chemistry

Commitment Item 21 specified that the existing fuel oil chemistry program was credited for license renewal and that the program would be enhanced prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis document, scheduled, and completed work orders, issue reports, and implementing procedures to verify that the program is being implemented for Unit 3. The inspectors verified that the licensee has implemented a program that evaluates the material condition and bottom thickness of the fuel oil storage tanks to ensure aging effects are effectively managed. The inspectors reviewed work orders and procedures implemented to ensure the licensee initiated evaluations at an appropriate threshold, commensurate with the programs requirements. The inspectors also reviewed Operating Experience to ensure the licensee was screening appropriately in addition to performing evaluations when necessary.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 21.

22. Item 22, Reactor Vessel Surveillance

Commitment Item 22 specified that the existing reactor vessel surveillance Aging Management Program was credited for license renewal and that the program would be enhanced prior to the period of extended operation. The program is implemented through station procedures that conform to the requirements of 10 CFR Part 50, Appendix H, "Reactor Vessel Material Surveillance Program Requirements." Neutron embrittlement is predicted utilizing chemistry tables and Position 1.3 limitations as described in Regulatory Guide 1.99, Revision 2, "Radiation Embrittlement of Reactor Vessel Materials."

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis documents, implementing procedures and interviewed the plant personnel responsible for the program regarding these documents to verify that the program is being implemented for Unit 3. The inspectors verified that the licensee incorporated the testing requirements for reactor vessel test capsules have been incorporated into station programs and procedures similarly for both units.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 22.

23. Item 23, One-Time Inspection

Commitment Item 23 specified that the licensee perform one-time inspections of selected plant equipment to verify that current plant Aging Management Programs are effective in managing the effects of aging prior to the period of extended operation.

The one-time inspection program provides for examinations of representative materials in environments that are not expected to experience aging effects in order to verify that this is the case.

The licensee had established separate one-time inspection programs covering the specific commitments listed in the SER. General program requirements for this commitment were reviewed in Dresden Unit 2 Inspection Report 05000237/2009007 which identified two findings in this area.

The inspectors reviewed each program basis document, program changes, work orders, and corrective actions for the issues from the previous inspection. The inspectors also observed the one time visual examination of the High Pressure Coolant Injection (HPCI) lube oil piping. No issues were identified.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 23.

24. Item 24, Selective Leaching of Materials

Commitment Item 24 specified one-time visual inspection of a sample of materials susceptible to selective leaching of materials prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 inspection and ensured that the program remained effective for both units. The inspectors reviewed the licensing basis, the Selective Leaching of Materials Program basis documentation, completed work orders, and interviewed personnel responsible for the program regarding these documents and verified the program was appropriately applied to Unit 3.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 24.

25. Item 25, Buried Piping and Tanks Inspection

Commitment Item 25 specified an enhancement to complete one-time inspections prior to the period of extended operation. The Buried Piping and Tanks Inspection Program was an existing program that provided preventive and condition monitoring measures to manage loss of material, due to either corrosion of ferrous piping and tanks or aggressive chemical attack of asbestos concrete piping, from external environments for buried piping and tanks.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 inspection and ensured that the program remained effective for both units. The inspectors verified that planned and completed work orders and related CRs demonstrated that the program was appropriately applied to Unit 3

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 25.

26. Item 26, ASME Code, Section XI, Subsection IWE

Commitments 26 specified that the existing ASME Code, Section XI, Subsection IWE program was credited for license renewal and would be enhanced prior to the period of extended operation. This program implemented inservice inspection in accordance with the ASME Code, Section XI, Subsection IWE for the containment structure.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. Dresden Unit 3 is considered the

lead unit as it has more potential for corrosion of the containment shell due to previous wetting. The inspectors reviewed the program basis documents, and inspection records to verify that the program is being implemented for Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 26.

27. Item 27, ASME Code, Section XI, Subsection IWF

Commitment Item 27 ASME Code Section XI, Subsection IWF Component Support Program specified that the existing American Society of Mechanical Engineers (ASME) Code Section XI, Subsection IWF Component Support Program was credited for license renewal with enhancement to include inspection of Code Class MC supports.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the program basis document, implementing procedures, examination records, and related ARs to verify the program is being implemented on Unit 3. The inspectors also observed the licensee perform an underwater visual examination of torus column supports and reviewed the containment shear lug support examinations to determine if the licensee was effectively implementing this program. The inspectors observed the visual examination of the biological shield to containment stabilizers. No issues were identified.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 27.

28. Item 28, Appendix J of 10 CFR Part 50,

Commitment Item 28 specifies the existing 10 CFR Part 50 Appendix J Aging Management Program was credited for license renewal. The program provides for aging management of pressure boundary degradation due to loss of material in the primary containment and various systems penetrating primary containment. The program also manages changes in material properties of gaskets, “O” rings, and packing materials for the primary containment pressure boundary access points. Containment leak rate tests are performed to assure that leakage through the primary containment and systems and components penetrating primary containment does not exceed allowable leakage limits specified in the Technical Specifications. The program includes an exception to NUREG 1801 for two-ply design bellows that cannot be tested to satisfy the requirements of Appendix J. Testing is in accordance with NRC-approved alternate test until bellows are replaced.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis documents, issue reports implementing procedures, and interviewed the plant personnel responsible for the program regarding these documents to verify the program is being implemented on Unit 3. The inspectors verified that the requirements for testing two-ply bellows have been incorporated into station programs and procedures.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 28.

29. Item 29, Masonry Wall Program

Commitment Item 29 specified that the existing masonry wall program was credited for license renewal and would be enhanced prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 inspection and ensured that the program remained effective for both units. The inspectors reviewed the licensing basis, the program basis documentation, and interviewed responsible masonry wall program personnel to confirm that visual inspection of masonry walls was ongoing and would implemented into the period of extended operation. The inspectors verified that planned and completed work orders and related CRs demonstrated that the Masonry Wall program was appropriately applied to Unit 3.

The inspectors identified a minor concern with documentation of completed inspections not being entered into the licensee's records retention system. The licensee entered this issue into the corrective action program as IR 1129200.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 29.

30. Item 30, Structures Monitoring Program

Commitment Item 30 specified that the existing structures monitoring program was credited for license renewal and would be enhanced prior to the period of extended operation. The structures monitoring program was an existing program that provided for aging management of various structures and external surfaces of mechanical components within the scope of license renewal.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the program basis documents, and inspection records to verify that the program is being implemented for Unit 3. The inspectors walked down an area of the plant to compare current condition with that recorded from a walkdown conducted in 1996. No additional degradation was identified. The inspectors also observed the visual inspection of the pressure suppression piping supports.

The inspectors identified a minor concern with documentation of completed inspections not being entered into the licensee's records retention system. The licensee entered this issue into the corrective action program as IR 1129200.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 30.

31. Item 31, Regulatory Guide (RG) 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants

Commitment Item 31 specified that the existing RG 1.127, "Inspection of Water-Control Structures Associated with Nuclear Power Plants," program was credited for license renewal and would be enhanced prior to the period of extended operation. This program was part of the Structures Monitoring Program and consisted of procedures that

provided for condition monitoring of structural steel elements, concrete, and earthen structures within the scope of license renewal.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis documentation, and revised implementing procedures. The inspectors reviewed documents and video records of the U3 Discharge Outfall Structure below the water line VT-3 inspection completed during the D3R21 outage. No issues were identified.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 31.

32. Item 32, Protective Coating Monitoring and Maintenance Program

Commitment Item 32 specified enhancements to the Protective Coating Monitoring and Maintenance Program to be implemented prior to the period of extended operation. The Protective Coating Monitoring and Maintenance Program was an existing program that provided for aging management of Service Level I coatings inside primary containment. Service Level I coatings were used in areas where the coating failure could adversely affect the operation of post-accident fluid systems and thereby impair safe shutdown. The program provided for visual inspections to identify any condition that adversely affects the ability of the coating film to function as intended.

The inspectors reviewed the program basis documentation, revised implementing procedures, and pre-inspection trend report. The inspectors also observed portions of the torus vapor area coatings inspection, inspections in the Unit 3 drywell, and video records of underwater torus inspections conducted during D3R21.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 32.

33. Item 33, Electrical Cables and Connections Not Subject to 10 CFR 50.49 Environmental Qualification Requirements

Commitment Item 33 specified that licensee would develop a program that is consistent with NUREG-1801 AMP XI.E1 for electrical cables and connections installed in adverse localized environments not subject to 10 CFR 50.49 environmental qualification requirements.

The licensee developed a program to visually inspect all accessible electrical cables and connections installed in adverse localized environments for signs of accelerated age-related degradation. Additional inspections, repairs, or replacements are to be initiated as appropriate.

General program requirements for this commitment were reviewed in Dresden Unit 2 Inspection Report 05000237/2009007. A finding was identified at that time for failure to implement a program in accordance with the license renewal program basis document B.1.33. The inspectors reviewed licensing basis, the program basis documentation, revised implementing procedures and records of walkdowns for determining adverse localized environments and visual inspections for cables. The inspectors also reviewed corrective actions to address the finding from Inspection Report 05000237/2009007.

The inspector observed walkdown visual examinations of cables in several adverse environmental areas in the plant.

Based on the licensee's actions to correct the issues identified by the inspectors, the inspectors determined that the licensee met Commitment Item 33.

34. Item 34, Metal Fatigue of Reactor Coolant Pressure Boundary

Commitment Item 34 specified an enhancement to use the EPRI-licensed FatiguePro® cycle counting and fatigue usage factor tracking computer program, to provide for calculation of stress cycles and fatigue usage factors from operating cycles, automated counting of fatigue stress cycles, and automated calculation and tracking of fatigue cumulative usage factors prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 inspection to ensure that the program remained effective for both units. The inspectors verified that planned and completed work orders and calculations; and related CRs demonstrated that the Metal Fatigue of Reactor Coolant Pressure Boundary program was appropriately applied to Unit 3.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 34.

35. Item 35, Environmental Qualification (EQ) of Electrical Components

Commitment Item 35 specified that the licensee was to maintain the existing environmental qualification program of the electrical components for the period of extended operation.

Program activities establish, demonstrate and document the level of qualification, qualified configuration, maintenance, surveillance and replacement requirements necessary to meet 10 CFR 50.49.

The inspectors reviewed the licensing basis, program basis document, and various existing EQ Binders. The inspectors also reviewed the self-assessment report completed August 21, 2009, and corrective actions resulting from the assessment.

Based on the review of the timeliness and adequacy of the licensee's actions and assessment for the program, the inspectors determined that the licensee met Commitment Item 35.

36. Item 36, Boraflex Monitoring

The Boraflex Monitoring program is not applicable to Dresden Unit 3.

Dresden uses Boral as a neutron absorber material in the spent fuel pool, and has an existing Boral monitoring program specified in its UFSAR Section 9.1.2.3.1. Based upon recent operating experience communicated in NRC Information Notice 2009-26, "Degradation of Neutron-Absorbing Materials in the Spent Fuel Pool," the licensee has initiated actions to revise the current Boral surveillance program.

37. Item 37, Electrical Cables Not Subject to 10 CFR 50.49 Environmental Requirements Used in Instrument Circuits

Commitment Item 37 specified that the licensee was to develop a program to manage aging of cables in sensitive instrumentation circuits with low level signals in the Nuclear Instrumentation Systems and Radiation Monitoring Systems.

The program is applied to the cables of the Nuclear Instrumentation Systems which included source range monitors (SRMs), intermediate range monitors (IRMs), local power range monitors, and Radiation Monitoring Systems, which included drywell high range radiation monitors, main steam line radiation monitors, and the steam jet air ejector radiation monitors. The program specified a review of calibration and surveillance results, and cable testing for cable aging degradation before the period of extended operation and every 10 years thereafter.

General program requirements and the initial trending for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed Unit 3 test results. No issues were identified.

Based on the review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 37.

38. Item 38, Inaccessible Medium-Voltage Cables Not Subject to 10 CFR 50.49 Environmental Requirements

Commitment Item 38 specified that the licensee was to provide a new condition monitoring program in accordance with NUREG-1801, AMP XI.E3 to manage aging of five inaccessible medium voltage cables feeding the service water pumps.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the program basis document, corrective action documents and completed work orders for Unit 3.

Based on the review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 38.

39. Item 39, Corrective Action Program

Commitment Item 39 specified that the existing corrective action program was credited for license renewal.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The program was further reviewed in March 2010 and found adequate as documented in problem identification and resolution Inspection Report 05000237/2010006; 05000249/2010006.

The inspectors reviewed the corrective action program documents related to license renewal and identified no issues.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 39.

40. Item 40, Periodic Inspection of Non-EQ, Non-Segregated Electrical Bus Ducts

Commitment Item 40 specified that the licensee was to develop and implement a program to periodically inspect non-segregated bus ducts that connect the reserve auxiliary transformers (RATs) to 4160 V essential service (ESS), the non-segregated bus ducts that connect the Emergency Diesel Generators (EDGs) to the ESS buses, and the non-segregated bus ducts that connect ESS buses.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed completed Unit 3 work orders and reviewed photographic records of inspections performed during the Unit 3 outage. No issues were identified.

Based on the review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 40.

41. Item 41, Periodic Inspection of Ventilation System Elastomers

Commitment Item 41 specified that the existing periodic inspection of ventilation system elastomers was credited for license renewal and that the program would be enhanced prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed changes to the program that occurred after the Unit 2 inspection and ensured that the program remained effective for both units. The inspectors verified that planned and completed work orders and related CRs demonstrated that the program was appropriately applied to Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 41.

42. Item 42, Periodic Testing of Drywell and Torus Spray Nozzles

Commitment Item 42 specified that the existing periodic testing of drywell and torus spray nozzles was credited for license renewal.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed completed Unit 3 work orders and condition reports to verify that the program has been implemented on Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 42.

43. Item 43, Lubricating Oil Monitoring Activities

Commitment Item 43 specified that the existing lubricating oil monitoring program would be enhanced to include components exposed to an environment of lubricating oil in the following systems: the high pressure coolant injection system, the emergency diesel generator and auxiliaries system, the station blackout system, the electro-hydraulic control system prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed licensing basis, program basis document, implementing procedures, scheduled and completed work orders, and applicable corrective action program documents to verify the program is being implemented on Unit 3. The inspectors verified that the licensee has enhanced the program to include the systems and subsystems listed in the commitment item in necessary documents to ensure that aging is managed through the period of extended operation for Units 2 and 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 43.

44. Item 44, Heat Exchanger Test and Inspection Activities

Commitment Item 44 specified that the licensee would develop and implement an Aging Management Program for heat exchangers in scope of LR that are not tested or inspected by the open-cycle and closed-cycle cooling water system AMPs, to be completed prior to the period of extended operation. Additionally the Commitment Item states for the Dresden isolation condensers, the augmentation activities identified in NUREG-1801, lines IV.C1.4-a and IV.C1.4-b to manage loss of material and cracking will also be included in this Aging Management Program, and will provide for the following: (1) temperature and radioactivity monitoring of the shell side(cooling) water; (2) eddy current testing of the tubes; and (3) visual inspections of the channel head, tube sheets, and internal surfaces of the shell, prior to the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis document, implementing procedures, scheduled, and completed work orders, related action requests, Engineering Changes (EC) and Evaluations to verify the program is being implemented on Unit 3. One minor issue was identified with a lack of acceptance criteria for isolation condenser inspections. This was entered into the licensee's corrective action program as IR 1141127.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 44.

45. Item 45, Generator Stator Water Chemistry Activities

Commitment Item 45 specified that the licensee was to implement a plant specific, non-NUREG 1801, Generator Stator Water Chemistry activities program that manages aging by monitoring and controlling stator water chemistry per established procedures.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed Unit 3 chemistry reports to verify that parameters were also monitored for Unit 3.

Based on the review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 45.

46. Item 46, Periodic Inspection of Plant Heating System

Commitment Item 46 specified that the licensee would develop and implement an Aging Management Program to inspect components in the plant heating system once before the end of the current operating term and periodically at intervals not to exceed once every 5 years during the period of extended operation.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed completed Unit 3 work orders and condition reports to verify that samples for this inspection were also taken from Unit 3.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee met Commitment Item 46.

47. Item 47, Time-limited Aging Analysis (TLAA) - Neutron Embrittlement of the Reactor Vessel and Internals

Commitment Item 47 specified that revised Pressure Temperature (P/T) limits will be prepared and submitted to the NRC for approval prior to the start of the extended period of operation using an approved fluence methodology. On October 17, 2005, License Amendment No. 209 approved revised P/T limits. The amendments revise Technical Specification (TS) Section 3.4.9, "Reactor Coolant System Pressure and Temperature (P/T) Limits," by incorporating revisions to the P/T limit curves for 54 effective full power years (extending to the end of the renewed license). The ASME Code Case N-640 and N-588 were used for revising the P/T limits. The P/T limits will be managed using approved fluence calculations when there are changes in the power of core design in conjunction with surveillance capsule results from the BWRVIP integrated surveillance program.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the licensing basis, program basis documents, implementing procedures, and interviewed the plant personnel responsible for the program regarding these documents reports to verify that samples for this inspection were also taken from Unit 3. The inspectors verified that the program requirements have been incorporated into station programs and procedures.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 47.

48. Item 48, TLAA - Metal Fatigue

Commitment Item 48 specified commitments to the TLAA related to metal fatigue. Specifically, the Unit 2 jet pump riser braces were to be repaired or replaced prior to the period of extended operation. In addition, plant-specific calculations were to be performed for applicable locations identified in NUREG/CR-6260, "Application of NUREG/CR-5999 Interim Fatigue Curves to Selected Nuclear Power Plant Components," for older-vintage BWR plants, to assess potential effects of reactor coolant on component fatigue life prior to the period of extended operation.

Unit 2 jet pump riser repairs for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed the Unit 3 plant-specific calculations performed for the applicable locations identified in

NUREG/CR-6260, “Application of NUREG/CR-5999 Interim Fatigue Curves to Selected Nuclear Power Plant Components,” for older-vintage BWR plants and verified the calculation assessed the potential effects of reactor coolant on component fatigue life.

Based on review of the timeliness and adequacy of the licensee’s actions, the inspectors determined that the licensee met Commitment Item 48.

49. Item 49, TLAA -Environmental Qualification of Electrical Equipment

Commitment Item 49 specified a reanalysis will be applied to EQ components now qualified for the current operating term of 40 years. The EQ binders for components within the scope of 10 CFR 50.49 will be updated to include environmental conditions associated with Extended Power Uprate implementation together with an extended operating period of 60 years.

The requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. The inspectors reviewed several examples for EQ Binders for components within the scope of 10 CFR 50.49 and verified no further unit specific review was required.

Based on the examples reviewed and adequacy of the licensee’s actions, the inspectors determined that the licensee met Commitment Item 49.

50. Item 50, Plant-Specific TLAAs

Commitment Item 50 specified that two specific TLAAs would be updated prior to the period of extended operation.

The first specified that the licensee conduct a UT inspection of the Dresden Unit 3 (the lead unit) drywell steel plate remaining thickness at the sand pocket level and use the results to revise the associated corrosion calculation and validate that an acceptable wall thickness will remain to the end of the 60-year licensed operating period.

The inspectors reviewed the licensing basis, inspection results, and related CRs; and interviewed the plant personnel responsible for the program. The inspectors also observed the licensee conduct UT inspection of the Dresden Unit 3 (the lead unit) drywell steel plate remaining thickness at the sand pocket level. A finding was identified and is detailed below in Section 4OA5.1.b. The inspectors verified that the licensee reaccomplished these inspections and evaluated the results. Evaluation EC 373104, Revision 3 determined that the thickness is expected to remain above ASME code allowable limits for approximately 59 years. The licensee intends to update this estimate with measurements taken every refueling outage.

The second TLAA specified that the licensee conduct a UT inspection of the ECCS suction strainer flange remaining thickness and use the results to revise the associated galvanic corrosion calculation and validate that an acceptable thickness will remain to the end of the 60-year licensed operating period.

The licensee changed the second part of this commitment that was associated with the second TLAA after the Unit 2 licensing renewal inspection as documented in Dresden Unit 2 Inspection Report 05000237/2009007. The licensee changed from a one-time inspection of the ECCS suction strainer flange to periodic inspections of the strainer bolt-

holes which will monitor the suction strainer flange corrosion throughout the period of extended operation. The inspectors reviewed the commitment change. The inspectors verified that the change was appropriate and verified by completed and planned work orders and related CRs that the TLAA was properly applied to Unit 3.

Based on review of the timeliness and adequacy of the licensee actions, the inspectors determined that the licensee met Commitment Item 50.

51. Item 51, BWR Operating Experience - EPU levels

Commitment Item 51 specified that the licensee perform an evaluation of operating experience at EPU levels to ensure that operating experience at EPU levels is properly addressed by the Aging Management Programs, and submit this evaluation to the NRC for review prior to entering the period of extended operation.

The inspectors documented in Dresden Unit 2 Inspection Report 05000237/2009007 that the licensee performed this evaluation and submitted it for NRC review on November 18, 2009. No further review was required.

52. AMP B.2.9, Periodic Inspection of Components Subject to Moist Air

This commitment, discussed in SER Section 3.0.3.18, specified that the licensee would manage the aging of components within the scope of the LR program through the performance of periodic UT inspections, visual (VT-3) inspections, and visual inspection of flexible hoses for age related degradation.

This program is a new program that manages the loss of material aging degradation of stainless steel, carbon steel, cast iron, aluminum, copper, and brass and bronze components. The licensee created this program to ensure that aging degradation of components is inspected at a frequency that allows the identification of any degradation that may occur due to the components exposure to a moist air environment. If abnormal conditions are identified as a result of any of the program's UT or visual inspections, the licensee committed to performing engineering evaluations to address the progression of the degradation and identifying appropriate corrective actions in accordance with the site controlled Quality Assurance Program.

General program requirements for this commitment were determined to be complete in Dresden Unit 2 Inspection Report 05000237/2009007. This is a sampling program and most of the inspections were conducted on Unit 2. The inspectors reviewed completed work orders on Unit 3 components. The inspectors reviewed documents and video records of the U3 HPCI turbine casing VT-3 boroscope inspection completed during the D3R21 outage. Additionally, the inspectors reviewed documents related to the inspection/overhaul of the HPCI turbine control valves. No issues were identified.

Based on review of the timeliness and adequacy of the licensee's actions, the inspectors determined that the licensee was meeting this commitment.

b. Findings and Observations

(1) Failure to Perform an Ultrasound Thickness Measurement of the Drywell liner in accordance with procedures.

Introduction: A finding of very low safety-significance and associated Non-Cited Violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," was identified by the inspectors for the failure of a licensee NDE examiner to accomplish activities affecting quality in accordance with procedures.

Description: On November 4, 2010, the inspectors observed a licensee NDE examiner performing an ultrasound thickness measurement of the drywell liner. This exam was to be performed in the core bore holes located in the drywell basement. These pre-existing core bore holes enabled the licensee to measure the thickness of the drywell liner and determine if degradation was occurring. Due to the configuration, water often filled these core bore holes and the condition of the liner surface was not readily known. The inspectors identified that the examiner failed to perform the examination in accordance with the requirements of procedure ER-AA-335-004, Revision 4, "Ultrasonic Measurement of Material Thickness and Interfering Condition." Specifically, this procedure states in part the surface shall be free of roughness and other conditions which may interfere with the free movement of the search unit or impair the transmission of ultrasound. Through discussions and observation, the inspectors identified that the examiner failed to ensure the surface to be examined was clean or prepared prior to performing of the UT examination. After performing the thickness measurements, the licensee noted discrepancies in the results of this examination and decided to re-perform the examination. Prior to re-performing the test, the licensee cleaned and prepared the surface as required by the procedure. The subsequent results appeared to be more consistent and more aligned with expectations.

In response to NRC questions, the licensee initiated AR 01141740 to address the concerns.

Analysis: The inspectors determined that the failure to adequately perform an ultrasound thickness measurement of the drywell liner in accordance with procedures was contrary to 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," and was a performance deficiency.

The finding was determined to be more than minor because if left uncorrected, it would have the potential to lead to a more significant safety concern. Specifically, potential degradation could have gone undetected had the inspector not questioned the conduct of the examination, and the results had come out above acceptance criteria.

The inspectors determined the finding could be evaluated using the SDP in accordance with IMC 0609, "Significance Determination Process," Attachment 0609.04, "Phase I - Initial Screening and Characterization of findings," Table 4a for the Barrier Integrity cornerstone. The inspectors determined that the finding was of very low safety-significance (Green) because the inspectors answered no to all of the worksheet questions.

The inspectors did not find an applicable cross-cutting aspect which represented the underlying cause of this performance deficiency; therefore, no cross-cutting aspect was not assigned.

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

procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Procedure ER-AA-335-004 “Ultrasonic Measurement of Material Thickness and Interfering Conditions” Part 3.3.5 states “verify the contact surfaces on the material to be examined are free from weld spatter, roughness, of other conditions, which may interfere with free movement of the search unit or impair the transmission of sound.”

Contrary to the above, on November 4, 2010, the licensee failed to clean and prepare the surface for the performance of the UT examination and in turn ensure the surface to be examined was free of roughness or other conditions that could interfere with the free movement of the search unit or impair the transmission of sound. Because this violation was of very low safety-significance and it was entered into the licensee’s corrective action program as AR 01141740, this violation is being treated as an NCV, consistent with Section 2.3.2 of the NRC Enforcement Policy (NCV 05000249/2010010-01), “Failure to Perform an Ultrasound Thickness Measurement of the Drywell liner in Accordance with Procedures.”

c. Overall Conclusions

The inspectors did not identify any other substantive instances of incomplete license renewal commitments with respect to timeliness or adequacy. The licensee has implemented corrective actions for the finding detailed above; therefore, the inspectors concluded that commitments, license conditions, and regulatory requirements associated with the issuance of the renewed operating license were being met at the Dresden Nuclear Power Plant Unit 3.

4OA6 Management Meetings

.1 Exit Meeting Summary

On November 19, 2010, the inspectors presented the inspection results to Mr. T. Hanley, and other members of the licensee staff. The licensee acknowledged the issues presented. The inspectors confirmed that none of the potential report input discussed was considered proprietary.

.2 Interim Exit Meetings

An interim exit was conducted on October 29, 2010, where the inspectors presented the Phase II inspection results to Mr. J. Sipek and other members of the licensee staff. The licensee acknowledged the issues presented.

The inspectors confirmed that none of the potential report input discussed was considered proprietary. Proprietary material received during the inspection was returned to the licensee.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

T. Hanley, Site Vice President
S. Marik, Station Plant Manager
G. Ice, Regulatory Assurance - NRC Coordinator
D. Gronek, Operations Director
J. Hansen, Corporate Licensing
L. Jordan, Training Director
R. Kalb, Chemistry
P. Karaba, Maintenance Director
J. Kish, Engineering Programs
D. Leggett, Regulatory Assurance Manager
R. Laburn, Radiation Protection
P. Mankoo, Chemistry Supervisor
P. O'Connor, Licensed Operator Requalification Training Lead
M. Overstreet, Lead Radiation Protection Supervisor
C. Podczerwinski, Maintenance Rule Coordinator
P. Quealy, Emergency Preparedness Manager
E. Rowley, Chemistry
R. Rybak, Regulatory Assurance
J. Sipek, Engineering Director
N. Starcevich, Radiation Protection Instrumentation Coordinator
J. Strmec, Chemistry Manager
S. Vercelli, Work Management Director

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened and Closed

05000249/2010010-01	NCV	Failure to Perform an Ultrasound Thickness Measurement of the Drywell liner in accordance with procedures (4OA5.1.b(1))

LIST OF DOCUMENTS REVIEWED

The following is a partial list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspector 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.

General

AR 01131093; LR UFSAR Appendix A Updates Needed; October 26, 2010
CC-AA-102; Design Input and Configuration Change Impact Screening; Revision 20
CC-AA-104; Document Change Requests; Revision 10
ER-AA-700-1002; 10CFR 54.73(b) Review Process; Revision 0

Commitment Item 1

DTS 0200-02; RPV In Vessel Inspection Procedure; Revision 9
WO 1187647; 24M/RFL TS RPV Internals Inspect- Required Each Refuel; D3R21

Commitment Item 2

AR 00220273; U-3 Feedwater and Condensate D02 Below Action Level One; May 9, 2004
AR 00283450; U-3 Feedwater Iron Exceeds Action Level One for 96 Hours; December 14, 2004
AR 00442028; Increased Freq of Action Level Entries for Rx S04 and FW Fe; January 13, 2006
AR 00534325; Unplanned Trip of H2 Addition on Both Uunits 2 and 3; September 21, 2006
AR 00561763; Conductivity Excursion During Unit 3 Startup; November 24, 2006
AR 00624244; 3 FW Conductivity above Action Level 1; May 1, 2007
AR 1100364; Backwash Air Leaking by AOVs for 3D Condensate Filter; August 11, 2010
AR284884; U3 Reactor Water Sulfates Exceed Action Level One; December 21, 2004
AR942596; LR-Chemistry BWRVIP Commitment Item Requires Update; July 16, 2009
CY-AA-160-100 R3 Attachment 1; U2 and U3 Chemistry Data; June 3, 2010
CY-AA-160-100 R3 Attachment 1; U2 and U3 Chemistry Data; March 17, 2010
CY-AA-160-100 R3 Attachment 1; U2 and U3 Chemistry Data; May 12, 2010
CY-DR-110-200 R19 Attachment 15; U3 Rx Bldg Sample Panel North Side EPN 3-2253-30 Samples; March 17, 2010
CY-DR-110-200 R20 Attachment 15; U3 Rx Bldg Sample Panel North Side EPN 3-2253-30 Samples; May 12, 2010
CY-DR-110-200 R21 Attachment 15; U3 Rx Bldg Sample Panel North Side EPN 3-2253-30 Samples; June 3, 2010

Commitment Item 3

ER-AA-330-002; Inservice Inspection of Section XI Welds And Components; Revision 8
ER-AA-330-009; ASME Section XI Repair/Replacement Program; Revision 5
FASA No. ATI 721964; ASME Section XI Inservice Inspection Program; September 10, 2008

Commitment Item 4

CR 00844389; D3R20 IVVI Steam Separator Guide Rod Indication; November 13, 2008
FASA No. 00738673-03; Dresden RPV and Internals Program 2008 Pre-INPO; June 2, 2008
WO 00977573; D3 24M/RFL TS RPV Internals Inspection-Req'd

Commitments 5 and 6

3R18-07; NDE Exam Summary 3/1/ RPV SHELL/N9-1; November 7, 2004
3R18-14; NDE Exam Summary 3/1/ RPV SHELL/N9-2; November 7, 2004
3R18-48; NDE Exam Summary 3/1/0308-3/CRD-01F; November 7, 2004
ER-AA-330-002; Inservice Inspection of Section XI Welds and Components; Revision 8
ER-AA-330-009; ASME Section XI Repair/Replacement Program; Revision 5
GE-NE-523-A71-0594-A, Alternate BWR Feedwater Nozzle Inspection Requirements; Revision 1
WO 1202590; D3 10Y/RFL CM UT All Reactor Feedwater Nozzles/Every 10 years

Commitment Item 7

AR 993205; CC-AA-5010-1017 does not Contain License Renewal Annotation; November 13, 2009
AR 9991479; LR – Commt / UFSAR CHNG PPWK Required for BWRVIP-75 to 75A
LSA-AA-107-1001; Attachment 1 UFSAR Change Request 9026; November 12, 2009
SVPLTR No. 09-0007; Owner's Activity Report Submittal Fourth 10-Year Interval 2008 Refueling Outage Activities; February 11, 2009

Commitment Item 8

08-422; VT-2 Exam Record; November 16, 2008
B.1.8; BWR Penetrations; Revision 1
ER-AA-330-002; Inservice Inspection of Section XI Welds and Components; Revision 9
ER-AA-330-009; ASME Section XI Repair/Replacement Program; Revision 5
IR 00846258; Leakage Identified During D3R20 ASME Class 1 Leakage Test; November 16, 2008
IR 00846638; Leakage Identified During D3R20 ASME Class 1 Leakage Test; November 18, 2008
SVPLTR No. 09-0007; Owner's Activity Report Submittal Fourth 10-Year Interval 2008 Refueling Outage Activities; February 11, 2009

Commitment Item 9

AR 00841465; D3R20 IVVI Wear Identified On Jet Pump 9 Auxiliary Wedge; November 6, 2008
AR 00864911; NOS ID License Renewal Commitment Deficiency; January 9, 2009
AR 00871977; UFSAR Appendix A Contains Outdated BWRVIP Commitment; January 26, 2009
AR 841482; D3R20 IVVI Wear Identified On Jet Pump 11 Auxiliary Wedge; November 6, 2008
AR 843081; D3R20 IVVI Feedwater Sparger End Bracket Pin Wear; November 10, 2008
EC 364394; Dresden Engineering Evaluation of Unit 3 Feedwater Sparger End Bracket Wear; January 31, 2007

EC 371179 Dresden Unit 3 Flaw Evaluation for Core Shroud Ring Segment Flaws; June 19, 2008
EC 372975; Dresden Evaluation of Unit 3 Jet Pump Auxillary Wedge wear; November 18, 2008
IR 00942596; LR – Chemistry BWRVIP Commitment Requires Update; July 16, 2009
IR 00959362; License Renewal Discrepancies with AMP B.1.09; August 30, 2009
WO 00977573 D3 24M/RFL TS RPV Internals Inspection

Commitment Item 10

DRE02.G03; ISI Program Plan Dresden Nuclear Power Station Units 2 and 3, Fourth Interval; Revision 6
DTS 0200-02, Revision 10, RPV Invessel Inspection
EC 376712; Engineering Evaluation for Thermal Aging/Neutron Embrittlement of Reactor Internals Components; August 26, 2009
ER-AB-331-101; Evaluation for Thermal Aging/Neutron Embrittlement of Reactor Internals Components; Revision 1
IR 976837; LR: NRC Identifies Issue with License Renewal Commitment; October 8, 2009
SVPLTR: No. 09-0053; Revised License Renewal Commitment for Thermal Aging and Neutron Irradiation Embrittlement of Cast Austenitic Stainless Steel (CASS) Reactor Internal Components; November 12, 2009
UFSAR Change Request No. 09-010 – Revisions to Appendix A, Sections A.1.9, A.1.12, A.1.23, A.1.25, A.1.27, and A.1.34.

Commitment Item 11

AR 00918578; UFSAR Change Request for License Renewal; May 12, 2009
AR 00991393; NRC – FAC Drawings not in EDMS; November 10, 2009
AR 00991393; NRC – FAC Drawings not in EDMS; November 10, 2009
AR 00991454; LR Reference Inaccurate Document Number; November 10, 2009
Dresden Unit 2 and Unit 3 FAC System Susceptibility Evaluation; December 18, 2006
EPRI Report 1011838; NSAC-202L-R3, Recommendations for an Effective Flow-Accelerated Corrosion Program; May 2006
ER-AA-1001; Guidelines for Flow Accelerated Corrosion Activities; Revision 4
ER-AA-430; Conduct of Flow Accelerated Corrosion Activities; Revision 4
NUREG-1344; Erosion/Corrosion Induced Pipe Wall Thinning in US Nuclear Power Plants; April 1989
Report 2MS07C, FAC Program UT Analysis Report; November 6, 2007
Report 2MS12D, FAC Program UT Analysis Report; November 3, 2007

Commitment Item 12

AR 01138740; Corrosion on U3 ISCO shell to tube bundle flange; November 11, 2010
EC 355444; Evaluation of Leakage at Bolted Connection on Isolation Condenser (3-1302) West Port Flange WO 680399-01; D2/3 2Y PM DG per DMS 6600-02; March 30, 2006
ER-DR-2030; System/ Component Walkdown; Revision 0
WO 01354454; D3 RFL COM SDC Sys W/D of Inaccess Comp and 2Y Rollup; November 3, 2010
WO 752632-01; D3 RFL PM required ISI Insp Sys 15; November 13, 2006

WO 798624-01; D3 40M TS Pressure Testing of HPCI Piping; March 20, 2008
WO 889893-01; D3 2Y PM DG per DMS 6600-03; January 25, 2008
WO 946281-01; D3 2Y PM SBO DG per DMS 6600-04; May 9, 2008

Commitment Item 13

3-5746-A; No. A LPCI Room Cooler Eddy Current Results; November 9, 2010
AR 01137638; Inspection Results from 3A LPCI Room Cooler Inspection; November 9, 2010
AR 01139288; Improvements for LPCI Room Cooler Inspections; November 12, 2010
AR 766627; Excessive Vibrations B Train CREVS RCU; April 23, 2008
AR 884707; Degraded CCSW Piping Identified; February 24, 2009
AR 945577; Wkly RVW of TBCCW/RBCCW Trends Not Documented Per Amp; July 24, 2009
AR 959352; LR: Missed LR Commitment, DMP 3900-01; August 30, 2009
EC 353764; Diesel Generator Cooling Water Pump Discharge Piping; February 14, 2005
ETSS-DRE-2(3)-1503-A(B)-CuNi; Examination Technique Specification Sheet, Unit 2 or 3 LPCI Heat Exchangers; Revision 5
IR 959227; LR Discrepancies with OCCWS B.1.13d Amp; August 29, 2009
IR 959426; LR: Change LR Response to ACIT 101522.20.03; August 30, 2009
ML-NDE-017; Eddy Current of Non-Ferromagnetic Heat Exchanger Tubing; Revision 0
RM-AA-102-F-01; Vendor Document Review Form, M-Lee Procedure ML-NDE-017; Revision 0
WO 01188769; 3A LPCI Room Cooler Heat Exchanger Inspection Report; November 1, 2010
WO 01204818; 3B LPCI Room Cooler Heat Exchanger Inspection Report; November 1, 2010
WO 1065522; CREVS Emergency Supply Valve Does Not Pass Flow (Div II); October 15, 2007
WO 550269-01/2; Inspection and Cleaning Of CCW Vault Cooler Coil Fans and Filter U2; February 26, 2007
WO 573565; D2 5y Com DGCW Pp Disch Reducer/Elbow UT Wall Thick Insp; January 6, 2005
WO 589201-01/04; Component Cooling Service Water Pump Maintenance;
WO 596705; One-Time Inspect Intake Ice Melt Line (License Renewal); June 11, 2007
WO 694850-01/2; Inspection and Cleaning Of CCW Vault Cooler Coil Fans and Filter U3; April 11, 2008
WO 853546; CREVS HVAC RCU Heads and Tube Sheets Degraded; September 15, 2008

Commitment Item 14

AR 945577; Weekly Review of TBCCW/RBCCW Trends Not Documented per AMP; July 24, 2009
CY-AA-120-400; Closed Cooling Water Chemistry; Revision 12
CY-DR-120-400; Closed Cooling Water System Manipulations for Chemistry Needs; Revision 5
CY-DR-120-410; DGJCW and HRSS Closed Cooling Water System Manipulations; Revision 3
DOS 6600-01; Diesel Generator Surveillance Tests; Revision 110
DOS 6620-03; Filling or Draining Unit 2(3) SBO D/G Jacket Water System; Revision 3

DOS 6620-07; SBO 2(3) Diesel Generator Surveillance Tests; Revision 27

Commitment Item 15

AR 00924746; LR-Crane Inspections Results Do Not Comply with AMP; May 28, 2009
IR 1092595; LR - Crane Inspection Results Do Not Comply With Amp; July 20, 2010
IR 1106089; Closure of Poorly Worded License Renewal Related ATI; August 12, 2010
WO 01096699-01; EM D3 Ann OSHA Turb Bldg Oh Crane 3-5802 Inspection; January 9, 2009
WO 01160103; MM D3 Ann Pm Rx Bldg Hatch 613 l El Jib Crane Inspection; August 5, 2009
WO 01252793; MM D2/3 Annual COM Rx Building Overhead Crane Inspection; completed June 25, 2010
WO 1152257; MM D3 Ann Pm Refueling Platform, Hoisting Equip. Inspection; April 9, 2009
WO 1202252; MM-D3 Ann Com OSHA Turb Bldg Overhead Crane Inspection; January 4, 2010
WO 1252793; D2/3 Annual OSHA Reactor Bldg Overhead Crane Inspection Stated Safe for Operation; June 25, 2010

Commitment Item 16

AR 484118; Drywell Pneumatic Nitrogen Not Meeting Air Quality Standard; April 27, 2006
AR 921677; LR DTS 4700-01 Change; May 19, 2009
Dos 1600-28; Air Operated Valve Fail Safe and Accumulator Integrity Test; Revision 16
DTS 4700-01, Sampling Unit 2(3) Instrument Air, Revision 10
WO 756747; D3 RFL COM System Instrument Air System (MSIV Room) WD by Sys Engr; November 4, 2006
WO 864089; D2 RFL COM Instrument Air Sys (MSIV Room) By Sys Engr; November 9, 2007
WO 976113; D3 RFL PM Leak Test of Outboard MSIV Accumulators; November 11, 2008
WO 976814; D3 RFL PM LLRT of Target Rock Relief Pneumatic System; November 12, 2008

Commitment Item 17

PMRQ 00004500; D3 5RFL COM MOV Diagnostic Testing 3-1201-2
PMRQ 00004502; D3 5RFL COM MOV Diagnostic Testing 3-1201-3
WO 00507559; D3 5RFL COM MOV Diagnostic Testing 3-1201-1A; February 23, 2009

Commitment Item 18

DFPS 4123-01; Unit 1 Diesel Fire Pump Operability; Revision 41
DFPS 4123-05; 2/3 Diesel Fire Pump Operability; Revision 44
DFPS 4123-06; Unit 2/3 Diesel Fire Pump Capacity Check; Revision 32
DFPS 4175-02; Operating Fire Stop/Break Surveillance; Revision 25
DFPS 4175-03; Shutdown Fire Stop Surveillance; Revision 22
DFPS 4175-07; Fire Door/Oil Spill Barrier Surveillance; Revision 27
DFPS 4175-09; Fire Damper Visual Inspection; Revision 15
DFPS 4175-11; Appendix R Cable/Conduit Firewrap Inspection; Revision 8

DFPS 4195-02; Auxiliary Electrical Equipment Room Halon System Test; Revision 25
DOS 1300-03; 2/3A(B) Isolation Condenser Makeup Pump Quarterly Operability; Revision 18
DOS 1300-05; 2/3A(B) Isolation Condenser Makeup Pump Capacity Test; Revision 5
OP-AA-201-001; Fire Marshal Tours; Revision 5

Commitment Item 19

DFPS 4132-01; Verification of Unit 1, 2 and 3 Sprinkler System Integrity; Revision 19
DFPS 4132-03; Verification of Unit 3 Sprinkler Systems Integrity; Revision 17
DTS 3900-07; Crib House/Intake Structure Inspection; Revision 13
IR 00879563; Fire Hydrant 3 Stuck Open; February 11, 2009
IR 00926375; Fire Hydrant FH-36 Was Flushed but Will Not Close; June 1, 2009
R 00934582; Fire Hydrant FH-28 Has Stem Leakage; June 22, 2009
WO 00976069 02; D3 2Y PM Fire Protection Strainer Inspection 3-4102-26; November 13, 2008
WO 00976069-01; D3 RFL TSTR TR32 Deluge Flow Test and Strainer Inspection; November 12, 2008
WO 01063052; D2/3 IBM NFPA Fire Water Supply Drain Test; March 16, 2009
WO 01141920-01; D1/2/3 AN TSTR Fire Hydrant Flush/Lubrication; June 24, 2009
WO 01145790-01; D3 AN PM Perform Fire Protection System Piping Inspections; August 15, 2009
WO 01174225-01; OP 03 18M TSTR/COM TR32 Simulated Auto Deluge Test and Vis Inspection; April 12, 2010
WO 01198568-01; 01/2/3 AN TSTR/COM Fire System Annual System Flush; December 28, 2009

Commitment Item 20

B.1.20 VOL 1; Above Ground Carbon Steel Tanks (Sections 1-8); Revision 1
B.1.20 VOL 2; Above Ground Carbon Steel Tanks (Sections 9 – 10); Revision 1

Commitment Item 21

WO 1112790-01; D3 10Y PM Internal Inspection of Tanks 3-5280-204; May 10, 2010
WO 1245863; D3 1M TS Diesel Fuel Oil Day Tank, Sample Fuel Oil; July 28, 2009
WO 1245864; D3 1M TS Outside Fuel Oil Storage, Sample Fuel Oil; July 28, 2009
WO 1247665; OP D2/3 1M TS Diesel Generator Fuel Oil Day Tank Sample; August 5, 2009
WO 1247363; D3 1M TS Unit Diesel Generator Operability; July 28, 2009
WO 99065763; D3 8Y TS Clean/UT EDG FOST; January 23, 2008
WO 99065764; D2/3 8Y TS Clean/Inspect Edg Fuel Oil Storage Tank; January 1, 2006

Commitment Item 22

BWRVIP – 102, dated June 2002, BWR Vessel and Internals Project BWR Integrated Surveillance Program Implementation Guidelines.
BWRVIP-86-A, dated October 2002, BWR Vessel and Internals Project Updated BWR Integrated Surveillance Program (ISP) Implementation Plan.
ER-AA-370; Reactor Coolant Pressure Boundary (RCPB) Integrity; Revision 7
ER-AB-331-103; BWR Vessel Integrated Surveillance Program Implementation; Revision 1

NRC letter dated Feb. 24, 2006, to Bill Eaton, BWR VIP Chairman, "Proprietary Safety Evaluation of the "BWRVIP Vessel and Internals Project, Integrated Surveillance Program (ISP0 Implementation for License Renewal (BWRVIP-116)," EPRI Report TR-1007824, and July 2003
SER for BWRVIP-116; Vessel and Internals Project, Integrated Surveillance Program (ISP) Implementation for License Renewal

Commitment Item 23

AR 01004426; Corrosion Rate for ECCS Suction Strainer Flange; December 11, 2009
AR 01095192; License Renewal Inspection Not Completed; July 28, 2010
AR 01099469; Recommended UFSAR Change - LR B.1.23K; August 9, 2010
B.1.23A Part 1; One-Time Inspection - Torus Chemistry Verification Tabs 1 Thru 9; Revision 1
B.1.23C; One-Time Inspection - Ventilation Systems; Revision 1
B.1.23D; One-Time Inspection - Compressed Gas Systems; Revision 1
B.1.23F; Vol 1; Vent and Drain Management; Revision 1
B.1.23G; One Time Inspection - AMR M02 NSR-SR Interaction; Revision 1
B.1.23H; One-Time Inspection of Lubricating Oil; Revision 1
B.1.23I; One-Time Inspection of Condensate Water Components; Revision 1
B.1.23J; One-Time Inspection - Cracking In Class 1 Piping Less Than 4 inches; Revision 1
B.1.23K; One-Time Inspection - SBLC Chemistry Verification; Revision 1
B.1.23L; One Time Inspection - Lubrite Base Plates; Revision 1
B.1.23M; Fuel Pool Cooling and Demineralizer Sys Pipe Insp (Dre Only); Revision 1
CCEF 09-07; Delete commitment for HPCI flexible hoses; April 28, 2010
CCEF 10-001; NUREG 1796, Appendix A Commitment 50; January 13, 2010
EC 0000381140; Evaluation of U2 Fuel Pool Cooling Return Line for LR Commitment B.1.23M; Revision 0
ERA-335-017; VT-3 Visual Examination of Pump and Valve Internals; Revision 5
USAR Change 10-020; LR B.1.23K; September 2, 2010
WO 00978519; Perform UT Inspection ECCS Suction Flanges; November 12, 2008
WO 01204167; Perform UT Inspection ECCS Suction Flanges

Commitment Item 24

WO 00509646-01; One-Time Inspect HPCI Lube Oil Cooler Valve 3-2303-SOC; November 13, 2006
WO 00596677-01; One-Time Inspect Fire Protection Cable Tunnel Sprinkler System Test Tap Valve 2/3-41999-229; completed June 12, 2008
WO 00596678-01; One-Time Inspect Fire Protection Hose Station Valve 3-4100-F131; completed March 1, 2006
WO 00596685-01; One-Time Inspect Fire Protection Header Valve 3-4166-501; June 19, 2008
WO 00596704-01; One-Time Inspect Service Water Valve 3-3912-500-B; November 13, 2008
WO 00693296-03; One-Time Inspect DG Cooling Water Temperature Regulating Valve 3-6699-128; July 21, 2008
WO 0596676-01; One-Time Inspect D/G Cooling Water Pump Drain Valve 2/3-4100-DGC; completed March 28, 2006

WO 99207934-01; One-Time Inspect EDG Cooling Water Vent Valve 3-6699-127B; November 9, 2006

Commitment Item 25

AR 1113347; NOS ID – issues with License Renewal for Buried Pipe and Tanks; September 15, 2010
AR 1129045-02; Obtain Buried Tank Test Records from Vendor and Retain with Work Orders; October 21, 2010
AR 979733; Diesel Fire Pump Surveillance Results Incomplete; October 15, 2009
EC 377947; Evaluation of High Differential Pressure Found on Northwest Portion of Fire Protection System Yard Loop During Flow Testing; November 22, 2009
EC 379801; Evaluation of 2/3 EDG Fuel Oil Storage Tank Corrosion Rate and Remaining Life; Revision 000
IR 1129045; NRC LR Inspector Identifies Inadequate Corrective Actions; October 21, 2010
WO 00909913-01; D2/3 8Y TS CLEAN/UT,EDG Fuel Oil Storage Tank; March 30, 2010
WO 01237396-02; OP D1/2/3 3Y TS Fire System Triennial Flow Test - NW LOOP; October 13, 2009

Commitment Item 26

B.1.26, Part 1; ASME Section XI, Subsection IWE, Revision 1
B.1.26, Part 2; ASME Section XI, Subsection IWE, Revision 1
WO 00712865; D3 3RFL UT INSP of the Cylindrical and Upper Spherical Areas; November 12, 2008
WO 00983765; D3 RFL PM Drywell Liner Leakage Inspection; November 7, 2008

Commitment Item 27

B.1.27; ASME Section XI, Subsection IWF; Revision 1
DWG 35; Male Stabilizer Detail, Pressure Suppression Containment Vessel; Revision 1
DWG 36; Female Stabilizer Assemble, Pressure Suppression Containment Vessel; Revision 0
ER-AA-330; Conduct of Inservice Inspection Activities; Revision 8
ER-AA-335-016; VT-3 Visual Examination of Component Supports, Attachments and Interiors of Reactor Vessels; Revision 5
ER-AA-335-016; VT-3 Visual Examination of Component Supports, Attachments and Interiors of Reactor Vessels; Revision 5
QP.10.09B; Procedure for VT-1 and VT-3 Visual Examinations of Class MC Metallic Shell and Penetration Liners and Class CC Pressure Retaining Components and their Integral Attachments; Revision 1

Commitment Item 28

AR 00846680; D3R20 LLRT ON 3-1201-1 and 1201-1A Exceeded Admin Alarm Limit; November 18, 2008
Document Id # 2008-63; Integrated Leakage Rate Test Final Report; December 1, 2008
WO 99027210; D3 15y TS Primary Containment (ILRT) Leak Rate Test; November 14, 2008

Commitment Item 29

Aging Management Program Results Book; B.1.29 Masonry Wall Program; Revision 1
ATI 508972-04; Form 09-01 D2/3 EDG El 504'6'' and Day Tank Area; April 6, 2009
ATI 508972-04; Form 09-03 D2 and D3 SBO building El 541'6''; April 10, 2009
ER-MW-450 R2 Attachment A; D3 Rx Bldg inspections EL 545.5 and 570; November 24, 2006
ER-MW-450 R2 Attachment A; D3 Rx Bldg inspections EL 545.5; September 12, 2006
ER-MW-450 R2 Attachment A; D3 Rx Bldg inspections EL 570; September 20, 2006
ER-MW-450 R2 Attachment A; D3 Rx Bldg inspections EL 589; September 26, 2006
ER-MW-450 R2 Attachment A; D3 Rx Bldg inspections EL 613; September 20, 2006
ER-MW-450 R2 Attachment A; D3 Turbine Bldg inspections EL 549 and SJAE; November 7, 2006
IR 1128616; Scheduling Masonry Wall Inspection Enhancement; October 20, 2010
IR 1129200; License Renewal Inspections not in Records Management; October 21, 2010
IR 1132426; NRC Questioned Open Actions from Previous IR; October 29, 2010
IR 555612; U3 B-SJAE Deficiencies during M-Rule Inspection; November 8, 2006
WR 224411; Grout baseplate for U3 SJAE by-pass to GLND STM CDSR;
WR 224412; U3 repair loose Masonry block joints CANCELLED; November 13, 2006

Commitment Item 30

B.1.30; Structures Monitoring Program Vol 1 Part 1; Revision 1
B.1.30; Structures Monitoring Program Vol 1 Part 2; Revision 1
B.1.30; Structures Monitoring Program Vol 6; Revision 1
ER-AA-335-016; VT-3 Visual Examination of Component Supports, Attachements and Interiors of Reactor Vessels; Revision 5
ER-MW-450; Structures Monitoring; Revision 5

Commitment Item 31

AR 00999776; LR: Evaluation of U2/3 Discharge Struct From Divers Video; December 1, 2009
AR 01136202; Inspection Results of U3 CW Outfall Structure; November 5, 2010
DTS 3900-07; Crib House /Intake Structure Inspections; Revision 13
WO 00983691; D3 2Y PM Crib House PP Bay B INSP/CLEAN/CHEM ADD; December 5, 2008
WO 00988816; D3 2Y PM Crib House PP Bay B INSP/CLEAN/CHEM ADD; December 5, 2008
WO 00993106; D3 2Y PM Crib House PP Bay A INSP/CLEAN/CHEM ADD; January 19, 2009
WO 01300035; Discharge Outfall Structure Inspection Below Water Line; November 3, 2010

Commitment Item 32

AR 00844356; D3R20 Containment Coatings Inspection Result; November 13, 2008
AR 00925566; Missed icense Renewal Commitment B.1.32 Coatings; May 29, 2009
AR 01137568; Results of D3R21 Drywell Coatings Walkdown; November 9, 2010
AR 01137571; D3R21 Torus Coatings Walkdown Results; November 9, 2010

AR 01139794; Unqualified Coating in U3 DW are Within Analyzed Limit; November 13, 2010
DTS 1600-11; Primary Containment and Coating Inspections; Revision 10
EC 381762; D3R21 Containment Coatings, Report for Trending and Analyzing U3 Coating Failures; Revision 000
ER-AA-330-008; Exelon Service Level I, and Safety-Related (Service Level III) Protective Coatings; Revision 7
Primary Containment and Coatings Inspection Report; DR321; November 5, 2010
WO 00978519; D3 RFL COM Desludge Torus, Clean ECCS Ring Header and Inspect; November 14, 2008
WSS-0724-0500-CI.01; Primary Containment and Coatings Inspection; November 5, 2008

Commitment Item 33

AR 00977284; NRC-Identified Potential Finding with LR Cable Inspections; October 09, 2009
IR 00963597; Walkdowns did not Include Attachment in Procedure MA-AA-723-500; September 10, 2009
MA-AA-723-500; Inspection of Non EQ Cables and Connections for Managing Adverse Localized Environments; Revision 4a

Commitment Item 34

Dresden FatiguePro LR Database Aattachments 3 and 4: U3 cycle counts and CUF from 1/30/1971 to 06/30/2010; Prepared September 8, 2010
IR 1130305; License Renewal Fatigue and Transient Monitoring Reports Not in Records Management; October 25, 2010
IR 983556, “NRC-Identified RIS 2008-30 Applies to Dresden Fatigue Calculation, October 23, 2009.
Service Request 70015; Predefine change PMID/RQ 17232 (FatiguePro PM to WO PM) to Require Submittal to Records Management; October 25, 2010
UFSAR Change 09-19; “SRV discharge lines” to USAR Section A.1.34; September 19, 2009

Commitment Item 35

AR 954985; Environmental Qualification (EQ) FASA – PM Frequency Deficiencies; August 14, 2009
AR 954995; Raychem Splice Temperature Restriction not in Calculation DRE 02-0042; August 14, 2009
EQ Binder No. EQ-15D; GE-NEBS Electrical Penetration Assembly Model F-01 Series; Revision 09
FRPT 883218-03; 2009 Dresden Station Environmental Qualification Program FASA; August 21, 2009

Commitment Item 36

AR 987616; Degradation of Neutron-Absorbing Materials in SFP; November 2, 2009

Commitment Item 37

WO 00978915; D3 24M/RFL TS Drywell Hi Rad Monitor Functional Cal; November 13, 2008
WO 00980591; D3 RFL COM SRM/IRM Cable Routing and Detector Test; November 20, 2008
WO 01197792; D3 84D TS LPRM Cal for Full Power Operation; February 9, 2009

Commitment Item 38

MA-AA-723-330; Electrical Testing of AC Motors Using Baker Instrument Advanced Winding Analyzer; Revision 2C
WO 00985943; D3 2Y COM Baker Test SW Pump Motor 3-3901-B; December 2, 2008
WO 00992067; D3 2Y COM Baker Test SW Pump Motor 3-3901-A; January 14, 2009

Commitment Item 39

AR 01054298; Water Discovered in Cable Manhole/Vault No. 2; April 8, 2010
AR 01094017; LR: U2 TBOC Crane Inspections Results do not Comply with AMP; July 24, 2010
AR 01095192; License Renewal Inspection Not Completed; July 28, 2010

Commitment Item 40

WO 00757055; D3 8Y COM EDG3 Bus Duct Internal Inspection; January 26, 2010
WO 00757056; D2/3 8Y COM Cross-Tie Bus 24-1/34-1 Duct Internal Inspection; December 11, 2009
WO 990051945; D3 3RFL Preventive Maintenance Inspection XFMR 32 Non-Segregated Bus Duct; September 21, 2000
WO 99211643; D3 4RFL PM Insp XFMR 32 Non-Segregated Bus Duct; November 14, 2010
WO 99214598; D3 4RFL PM Insp XFMR 31 Non-Segregated Bus Duct; November 6, 2010

Commitment Item 41

DTP 72; Elastomeric Material Hardness Test Procedure; Revision 0
IR 871995; Damper Gaskets 3-5772-101 and 3-9472-29 Degraded; January 26, 2009
IR 871999; Exit Door Damper Seals Degraded; January 26, 2009
WO 1237665; 3-5772-101 U3 EDG Room Degraded Exhaust Air Damper Seals Found; January 27, 2010
WO 1237665-01; 3-5772-101 U3 EDG Room Degraded Exhaust Air Damper Seals Replaced; January 27, 2010
WO 1237666-01; Damper Gaskets 3-5772-101 and 3-9472-29 Replaced; January 25, 2010
WO 738511-01; 4 YR PM Com U3 EDG Vent Sys Seal/Gasket Inspection; January 26, 2009

Commitment Item 42

IR 00958480; WO 326507-01 ID'd Degraded Spray Flow in Unit 3 Torus Bays; August 27, 2009

WO 00326507; D3 10Y/RFL TS LPCI Torus Spray Test; November 17, 2006

Commitment Item 43

WO 1222514-01; D3 QTR COM HPCI Turbine Lube Oil Reservoir-Draw Lab Anal; June 25, 2009
WO 1244153; D3 1M PM Reservoir EHC Fluid, Draw Smpl Smad/Azko; July 13, 2009
WO 95060352; D3 2Y PM Sample/Change Oil Pump Booster Bearing Housing HPCI

Commitment Item 44

AR 944176; Missing License Renewal Commitments for CREVS PMIDs; July 21, 2009
IR 1135773; U3 Isolation Condenser – Loose and Missing Bolting; November 4, 2010
IR 1137276; U3 Isolation Condenser – Internal Carbon Steel is Rusting; November 8, 2010
IR 1141127; U3 Isolation Condenser Missing from LR Program; November 16, 2010
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WO 790653; D3 2RFL PM Isolation Condenser Inspect /Eddy Current; November 4, 2006
WO 853078; D2/3 2Y COM Control Room Train B Air Handling Unit Inspection; July 16, 2007
WO 99223687; D3 6Y PM HPCI Gland Seal Cond/Clean/Insp Eddy Current Test AS; September 1, 2006

Commitment Item 45

B.2.7; Generator Stator Water Chemistry Activities; Revision 1
CY-AA-120-440; Stator Cooling Water Chemistry; Revision 5

Commitment Item 46

AR 01026170; No UFSAR Update Necessary for LR Program B.2.8; February 4, 2010
B.2.8; Periodic Inspection of Plant Heating Systems; Revision 1
WO 00788948; D3 5Y COM Inspect RB Intake STM Coil 3-5738 Strainer Drn Vlv; June 19, 2009
WO 00788974; 03 SY COM Inspect TB STM Supply Hdr Isol Vlv; September 18, 2009

Commitment Item 47

Dresden 2 and 3 Technical Specification, Amendment No. 209, Section 3.4.9, RCS Pressure and Temperature (P/T) Limits.

Commitment Item 48

Dresden FatiguePro LR Database Attachments 3 and 4: U3 Cycle Counts and CUF from 1/30/1971 to 06/30/2010; Prepared September 8, 2010
EXLN-15Q-302; Dresden and Quad Cities – Environmental Assisted -Updated Fatigue Analysis of Feedwater Nozzle; Revision 1

Commitment Item 49

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Service Request 21983; Predefine Addition PMD Various EQ PMS; December 3, 2008
WO 654253-01; 34-year EQ Pressure Switch Replacement PS-2-1466-A; September 8, 2005

Commitment Item 50

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AR 01138842; DW Liner UT Results Significantly Deviate from Expected Value; November 11, 2010
AR 1004426; Corrosion rate for ECCS Suction flange; December 11, 2009
Commitment Change Evaluation 10-001; LR Commitment Change for ECCS Suction Flange; January 13, 2010
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ER-AA-335-004; Ultrasonic Measurement of Materials Thickness and Interfering Conditions; Revision 4
PMID 11970-02; D3 2RFL Com UT ECCS Suction Flange at X303D; March 12, 2010
UFSAR Change 10-001; Incorporates Commitment Change 10-001 into UFSAR about ECCS Suction Flange; January 13, 2010
WO 0506317; NDES Perform UT Inspection U3 ECCS Suction Flanges; November 6, 2004
WO 978519; NDES Perform UT Inspection U3 ECCS Suction Flange X303D; November 12, 2008

AMP B.2.9

10-580; PT Examination Data Sheet of HPCI Turbine Control Valve; November 5, 2010
AR 01135733; Inspection of the U3 HPCI Steam Chest Gasket Damage; November 4, 2010
AR 01135857; U3 HPCI Turbine Steam Chest Flange Wear; November 4, 2010
AR 01135936; NDE Indications Discovered in HPCI Control Valve No.4; November 5, 2010
AR 01137162; Historical FME Identified in HPCI Turbine Inlet; November 8, 2010
AR01141400; NRC Concern on HPCI Turbine Casing Inspection; November 17, 2010
CCEF 10-03; HPCI Turbine Inspection Frequency; July 28, 2010
EC 382146; U3 HPCI Control Valve Seat No. 4 Crack Indications; Revision 0
EC 382147; U3 HPCI Steam Chest Flange Face Wear; Revision 0
WO 00747933-04; LR VT-3 Examination Report for HPCI Turbine Front Standard Casing; November 8, 2010
WO 00754131; One-Time Inspect 3A CS PP SU HDR VNT VLV; January 10, 2008

LIST OF ACRONYMS USED

ADAMS	Agencywide Document Access Management System
ASME	American Society of Mechanical Engineers
ATWS	Anticipated Transient Without Scram
BWR	Boiling Water Reactor
CASS	Cast Austenitic Stainless Steel
CCEF	Commitment Item Change Evaluation Form
CCSW	Component Cooling Service Water
CFR	Code of Federal Regulations
CR	Condition Report
CSCS	Core Standby Cooling System
EDG	Emergency Diesel Generator
EPRI	Electric Power Research Institute
EPU	Extended Power Uprate
ESS	4160 V Essential Service
FAC	Flow Accelerated Corrosion
GALL	NUREG-1801 “Generic Aging Lessons Learned”
IMC	Inspection Manual Chapter
INPO	Institute of Nuclear Power Operations
IP	Inspection Procedure
IR	Inspection Report
IR	Issue Report
ISI	Inservice Inspection
NCV	Non-Cited Violation
NEI	Nuclear Energy Institute
NFPA	National Fire Protection Association
NRC	U.S. Nuclear Regulatory Commission
NUMARC	Nuclear Management and Resources Council
PARS	Publicly Available Records
psid	Pounds Per Square Inch Differential
psig	Pounds Per Square Inch Gauge
P/T	Pressure Temperature
RAT	Reserve Auxiliary Transformer
RWCU	Reactor Water Cleanup
SBLC	Standby Liquid Control
SDP	Significance Determination Process
SER	Safety Evaluation Report
TLAA	Time Limited Aging Analysis
TR	Technical Report
UFSAR	Updated Final Safety Analysis Report
URI	Unresolved Item
Vac	Volts Alternating Current
Vdc	Volts Direct Current
WO	Work Order

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Sincerely,

/RA/

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

Docket Nos. 50-249
License Nos. DPR-25

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Letter to Mr. Michael J. Pacilio from Ms. Ann Marie Stone dated December 22, 2010.

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNIT 3 NRC POST-APPROVAL SITE INSPECTION FOR LICENSE RENEWAL INSPECTION REPORT 05000249/2010010

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