

## NRR-PMDAPEm Resource

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**From:** Mozafari, Brenda  
**Sent:** Monday, August 05, 2013 10:02 AM  
**To:** Mitchel.Mathews@exeloncorp.com  
**Subject:** RE: Dresden Nuclear Power Station Inservice Testing Relief Request RV-23H

**Importance:** High

Mitch,

We recommend that you clarify the last two sentences to be more explicit, e.g., "Under replacement activity, these valves were replaced on March 11, 2013, on Unit 2, and on December 8, 2007, on Unit 3. No defects were noted during replacement activity." When you send this (or something that is in this vein) I will add it into ADAMS as an Official Agency Record to support clarification of the original letter. I assume that these words are what you intent to convey.

*Thanks*

*Brenda*

301-415-2020

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**From:** [Mitchel.Mathews@exeloncorp.com](mailto:Mitchel.Mathews@exeloncorp.com) [<mailto:Mitchel.Mathews@exeloncorp.com>]  
**Sent:** Wednesday, July 31, 2013 4:12 PM  
**To:** Mozafari, Brenda  
**Subject:** Dresden Nuclear Power Station Inservice Testing Relief Request RV-23H

Ms. Mozafari,

In its April 1, 2013, response to NRC request RAI-RV-23H-3 for Dresden Nuclear Power Station, Units 2 and 3, Exelon Generation Company, LLC (EGC) stated that the valve internals for High Pressure Coolant Injection (HPCI) Valves 2(3)-2301-032 had not been repaired or replaced during the fourth inservice testing interval. That statement was intended to differentiate between valve internal inspection or replacement, and the six-year preventive maintenance activity to replace the entire valve assembly. Again, the activity described in this response is referring to the replacement of the valves on a six year frequency.

**RAI-RV-23H-3:**

*Section 5.0, "Proposed Alternative and Basis for Use," does not provide any operational history (i.e., maintenance and reliability data) or note any failures of solenoid-operated valves 2-2301-032 and 3-2301-032. Please provide details of the operational history and information regarding any failures of these valves for each unit. Also, describe how often the internals for these valves have been replaced or repaired and note any defects identified during maintenance activities, during the fourth ten-year inservice testing (IST) interval at Dresden 2 and 3.*

**EGC Response:**

A review of the work and Inservice Testing history of these valves did not identify any cases of these valves failing to stroke open since they were added to the IST Program scope in November 1994. EGC has a preventive maintenance activity to replace these DNPS valves once every six years. The valve internals were not repaired or replaced during the fourth ten year interval. This activity was last performed on March 11, 2013, on Unit 2, and on December 8, 2007, on Unit 3. No defects were noted.

Additionally, in Attachment 4, Section 4 of its October 30, 2012, EGC stated that, "Valve actuation may be indirectly verified by removing the HPCI system from service, filling the drain pot with water until the high level alarm is received, and observing that the high level alarm clears." In this case, the test is normally performed by DNPS Operations Department personnel performing a valve line-up to isolate the 2(3)-2301-32 from the HPCI system. The entire HPCI system is **not** removed from service for this test.

Please contact me with any additional need for clarification.

Regards,

Mitch Mathews

**Mitchel Mathews**  
**Sr. Regulatory Engineer**  
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**Hearing Identifier:** NRR\_PMDA  
**Email Number:** 804

**Mail Envelope Properties** (Brenda.Mozafari@nrc.gov20130805100100)

**Subject:** RE: Dresden Nuclear Power Station Inservice Testing Relief Request RV-23H  
**Sent Date:** 8/5/2013 10:01:54 AM  
**Received Date:** 8/5/2013 10:01:00 AM  
**From:** Mozafari, Brenda

**Created By:** Brenda.Mozafari@nrc.gov

**Recipients:**  
"Mitchel.Mathews@exeloncorp.com" <Mitchel.Mathews@exeloncorp.com>  
Tracking Status: None

**Post Office:**

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	2646	8/5/2013 10:01:00 AM
image001.png	185106	

**Options**  
**Priority:** High  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

**RAI-RV-23H-3:**

*Section 5.0, "Proposed Alternative and Basis for Use," does not provide any operational history (i.e., maintenance and reliability data) or note any failures of solenoid-operated valves 2-2301-032 and 3-2301-032. Please provide details of the operational history and information regarding any failures of these valves for each unit. Also, describe how often the internals for these valves have been replaced or repaired and note any defects identified during maintenance activities, during the fourth ten-year inservice testing (IST) interval at Dresden 2 and 3.*

**EGC Response:**

A review of the work and Inservice Testing history of these valves did not identify any cases of these valves failing to stroke open since they were added to the IST Program scope in November 1994. EGC has a preventive maintenance activity to replace these DNPS valves once every six years. The valve internals were not repaired or replaced during the fourth ten-year interval. This activity was last performed on March 11, 2013, on Unit 2, and on December 8, 2007, on Unit 3. No defects were noted.