

RS-13-219

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August 29, 2013

ATTN: Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Clarification Regarding the Inservice Testing of Dresden Nuclear Power Station High Pressure Coolant Injection (HPCI) Valves 2(3)-2301-32-SO (TAC No. ME9872)

- References:
1. Letter from P. R. Simpson (Exelon Generation Company, LLC (EGC)) to U. S. NRC, "Submittal of Relief Requests Associated with the Fifth Inservice Testing Interval," dated October 30, 2012
 2. Letter from P. R. Simpson (EGC) to U. S. NRC, "Response to Request for Additional Information Related to Request for NRC Approval of Relief Requests for Fifth Inservice Testing Interval (TAC Nos. ME9871 and ME9872)," dated April 1, 2013

In Reference 1, EGC requested approval of relief requests associated with the upcoming fifth inservice testing (IST) interval at Dresden Nuclear Power Station (DNPS), Units 2 and 3. In Reference 2, EGC provide additional information related to these relief requests in response to an NRC request.

During a telephone conversation between NRC and EGC personnel on July 31, 2013, NRC personnel requested that EGC provide additional clarification in support of the information provided in References 1 and 2 for the testing of DNPS, Units 2 and 3 HPCI valves 2(3)-2301-32-SO.

Specifically, in Reference 1, Attachment 4, Section 4, 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 2(3)-2301-32 from the HPCI system. The entire HPCI system is not removed from service for this test.

Additionally, in EGC's response to NRC Request RAI-RV-23H-3 provided in Reference 2, EGC stated that 2(3)-2301-32-SO valve internals were not repaired or replaced during the fourth ten-year inservice testing interval. The intent of this response was to convey the fact that the entire valve (i.e., actuator, valve body, valve bonnet, and internals), is replaced at a six-year frequency. This replacement activity is performed in lieu of valve disassembly and inspection and or repair of valve internals. The valves were last replaced on March 11, 2013, and on December 8, 2007, for DNPS Units 2 and 3, respectively. No inspection of the valve internals took place during the valve replacement activities.

Respectfully,

A handwritten signature in black ink, reading "Patrick R. Simpson". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Patrick R. Simpson
Manager – Licensing
Exelon Generation Company, LLC