Exelon Generation.

4300 Winfield Road
Warrenville, IL 60555
630 657 2000 Office

RS-13-248

10 CFR 50.55a

December 30, 2013

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

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

Subject: Relief Request I4R-17, Inservice Inspection Program Relief Request Regarding Examination Coverage for the Fourth Inservice Inspection Interval

In accordance with 10 CFR 50.55a, "Codes and standards," paragraph (g)(5)(iii), Exelon Generation Company, LLC (EGC), requests NRC approval of the attached relief request associated with the fourth inservice inspection (ISI) interval for Dresden Nuclear Power Station, Units 2 and 3 (DNPS). Relief is requested due to the impracticality of satisfying the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," due to plant design. The fourth ISI interval for DNPS ended January 19, 2013.

The relief request is based on the limitations that precluded completion of full Code examination requirements of ASME Class 1 and 2 welds during the fourth interval. Code examination of the welds was limited due to the materials of construction and design configurations. The DNPS fourth ten-year ISI program plan met the requirements of ASME Code, Section XI, 1995 Edition with 1996 Addenda.

EGC requests approval of these requests by December 30, 2014.

There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Mr. Mitchel A. Mathews at (630) 657-2819.

Respectfully,

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

Attachment: Dresden Nuclear Power Station 10 CFR 50.55a Request No. I4R-17

ATTACHMENT
Dresden Nuclear Power Station, Units 2 and 3 10 CFR 50.55a Request Number I4R-17
Relief Requested In Accordance with 10 CFR 50.55a(g)(5)(iii)
--Inservice Inspection Impracticality—

1. ASME Code Component(s) Affected

Code Class:	1 and 2
References:	IWB-2500, IWC-2500, Table IWB-2500-1, Table IWC-2500-1, ASME Code Case N-460, ASME Code Case N-578-1, Table 1
Examination Category:	B-A, B-D, B-K, B-M-1, C-B, C-C, R-A
Item Number:	B1.12, B1.40, B3.90, B3.100, B10.10, B10.20, B12.40, C2.21, C3.20, R1.11, R1.20
Description:	Limited examination coverage
Component Number:	See Tables 1 and 2 below for specific component identification

2. Applicable Code Edition and Addenda

The Inservice Inspection (ISI) Program for the Dresden Nuclear Power Station (DNPS), Units 2 and 3 fourth ISI interval was based on the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, 1995 Edition with the 1996 Addenda.

3. Applicable Code Requirement(s)

Table IWB-2500-1, Table IWC-2500-1, and Table 1 of Code Case N-578-1 Examination Categories/Item Numbers B-A, B1.12, B1.40, B-D, B3.90, B3.100; B-K, B10.10, B10.20; B-M-1, B12.40; C-B, C-C, C2.21, C3.20; and R-A, R1.11, R1.20 require a volumetric and/or surface examination, which includes essentially 100% of the weld. Dresden Nuclear Power Station (DNPS), Units 2 and 3 adopted ASME Code Case N-460, "Alternative Examination Coverage for Class 1 and Class 2 Welds, Section XI, Division 1," which defines "essentially 100%" as greater than 90% coverage of the examination volume or surface area, as applicable.

4. Impracticality of Compliance

Relief is requested in accordance with 10 CFR 50.55a(g)(5)(iii), on the basis that conformance with these Code requirements is impractical. Conformance would require extensive structural modifications to the component structure.

DNPS, Units 2 and 3, obtained Construction Permits CPPR-18 and CPPR-22 on January 10, 1966, and October 14, 1966, respectively. The piping systems and associated components were designed and fabricated before the examination requirements of ASME Section XI were formalized and published. Since DNPS, Units 2 and 3 were not specifically

designed to meet the requirements of ASME Section XI, full compliance is not feasible or practical within the limits of the current plant design.

Physical obstructions imposed by design, geometry, and materials of construction are typical of vessel appurtenances and sacrificial shield, insulation support rings, structural and component support members, adjacent component weldments in close proximity, unique component configurations and dissimilar metal weldments.

Tables 1 and 2 below indicate the refueling outage in which these welds were examined, and the coverage percentages obtained for those welds that have been examined. These tables are cumulative lists of all welds with limited examination coverage during the Fourth Interval.

Based on the above explanation, DNPS requests relief from the requirement to achieve greater than 90% volume and/or area coverage for the components listed in Tables 1 and 2 below, where greater than 90% coverage is impractical.

5. Burden Caused by Compliance

Compliance with the examination requirements of ASME Section XI would require modification of plant components to remove obstructions, redesigning of plant systems, and replacement of components where geometry is inherent to component design.

6. Proposed Alternative and Basis for Use

Proposed Alternative

In accordance with 10 CFR 50.55a(g)(5)(iii), EGC requests relief from ASME Section XI Code requirements on the basis that the required "essentially 100%" coverage examination is impractical due to physical obstructions and limitations imposed by design, geometry, and materials of construction for the components discussed in Tables 1 and 2 below.

EGC will continue to perform best effort examinations in order to achieve the maximum amount of coverage. Additionally, a VT-2 examination performed on the subject components during system pressure test per examination category B-P each refueling outage and category C-H each inspection period is performed.

Basis for Use

Examination techniques have been progressively upgraded during this interval to augment the required Section XI examinations. EGC has used the Electric Power Research Institute (EPRI), the Performance Demonstration Initiative (PDI), Inservice Inspection vendors and other industry sources to encourage the development and provide an awareness of improved examination techniques. The goal of these initiatives is to enhance coverage and flaw detection commensurate with radiation dose reduction.

EGC examination procedures are revised on a continuing basis to incorporate proven techniques for a higher level of safety and quality as they become available. The examinations and techniques used today exceed the examinations conducted in the past on each component.

All components received as a minimum, the required examination(s) applicable to the extent practical due to the limited or lack of access available. The examinations conducted, confirmed satisfactory results evidencing no unacceptable flaws present, even though "essentially 100%" coverage was not attained. EGC has concluded that if any active degradation mechanisms were to exist in the subject welds, those degradations would have been identified in the examinations performed.

Based on the above, with the vintage of the DNPS, Units 2 and 3 designs, the underlying objectives of the code required volumetric and surface examinations have been met. The examinations were completed to the extent practical and evidenced no unacceptable flaws present. Additionally, a VT-2 examination performed on the subject components during system pressure test per examination category B-P each refueling outage and category C-H each period provides additional assurance that the structural integrity of the subject components is maintained.

7. Duration of Proposed Alternative

Relief is requested for the fourth ten-year inspection interval of the Inservice Inspection Program for DNPS, Units 2 and 3.

8. Precedents

Relief was granted for the DNPS, Units 2 and 3 third ISI intervals in NRC safety evaluations dated January 8, 2003, and October 1, 2004.

Table 1: Dresden Nuclear Power Station, Unit 2 Fourth Inservice Inspection Interval Limited Coverage Components

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/RPV SHELL/2-SC1A-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	88.0%	UT	The completed examination was limited to 88.0% coverage due to proximity of the jet pump diffuser.
2/1/RPV SHELL/2-SC1B-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	40.2%	UT	The completed examination was limited to 40.2% coverage due to proximity of the shroud repair lower contact.
2/1/RPV SHELL/2-SC1C-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	40.2%	UT	The completed examination was limited to 40.2% coverage due to proximity of shroud repair lower contact.
2/1/RPV SHELL/2-SC1D-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	71.4%	UT	The completed examination was limited to 71.4% coverage due to proximity of jet pump restrainers and jet pump diffuser.
2/1/RPV SHELL/2-SC2A-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	69.0%	UT	The completed examination was limited to 69.0% coverage due to proximity of the jet pump riser brace, lower specimen and upper specimen brackets.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/RPV SHELL/2-SC2B-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	78.2%	UT	The completed examination was limited to 78.2% coverage due to proximity of the jet pump riser brace, lower specimen and upper specimen brackets.
2/1/RPV SHELL/2-SC2C-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	87.0%	UT	The completed examination was limited to 87.0% coverage due to proximity of the jet pump riser brace, lower specimen and upper specimen brackets.
2/1/RPV SHELL/2-SC3A-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	69.1%	UT	The completed examination was limited to 69.1% coverage due to proximity of the feedwater sparger and core spray downcomer piping.
2/1/RPV SHELL/2-SC3B-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	72.9%	UT	The completed examination was limited to 72.9% coverage due to proximity of the lower guide rod, feedwater sparger and core spray piping.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/RPV SHELL/2-SC3C-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	68.7%	UT	The completed examination was limited to 68.7% coverage due to proximity of the shroud repair tie rod, feedwater sparger and core spray piping.
2/1/RPV SHELL/2-SC3D-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	73.7%	UT	The completed examination was limited to 73.7% coverage due to proximity of the core spray piping and feedwater spargers.
2/1/RPV SHELL/2-SC3E-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	74.2%	UT	The completed examination was limited to 74.2% coverage due to proximity of the upper guide rod, core spray piping and feedwater spargers.
2/1/RPV SHELL/2-SC4C-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D2R22	85.7%	UT	The completed examination was limited to 85.7% coverage due to proximity of the steam dryer support.
2/1/RPV SHELL/N19A-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R20	47.7%	UT-45° S, 60° L, 60° S	The completed examination was limited to 47.7% coverage due to nozzle configuration and insulation support interference.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/RPV SHELL/N19B-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R18	38.0%	UT	The completed examination was limited to 38.0% coverage due to nozzle configuration and an insulation support bracket below the nozzle.
2/1/RPV SHELL/N1A-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D2R21	27.2%	UT-60° S, 70° S, 60° L	The completed examination was limited to 27.2% coverage due to nozzle configuration.
2/1/RPV SHELL/N1B-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D2R18	26.0%	UT	The completed examination was limited to 26.0% coverage due to nozzle configuration.
2/1/RPV SHELL/N2A-2	NOZZLE-VESSEL	Section XI	B3.90	D2R20	39.2%	UT-60° L	The completed examination was limited to 39.2% coverage due to nozzle configuration.
2/1/RPV SHELL/N2B-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R20	39.2%	UT-60° L	The completed examination was limited to 39.2% coverage due to nozzle configuration.
2/1/RPV SHELL/N2C-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R18	42.0%	UT	The completed examination was limited to 42.0% coverage due to nozzle configuration.
2/1/RPV SHELL/N2F-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R18	42.0%	UT	The completed examination was limited to 42.0% coverage due to nozzle configuration.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/RPV SHELL/N2H-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R18	42.0%	UT	The completed examination was limited to 42.0% coverage due to nozzle configuration.
2/1/RPV SHELL/N3D-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D2R22	33.5%	UT	The completed examination was limited to 33.5% coverage due to nozzle configuration.
2/1/RPV SHELL/N4A-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R20	39.3%	UT-45° S, 60° L, 60° S	The completed examination was limited to 39.3% coverage due to nozzle configuration and insulation interference.
2/1/RPV SHELL/N4B-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R20	39.3%	UT-45° S, 60° L, 60° S	The completed examination was limited to 39.3% coverage due to nozzle configuration and insulation interference.
2/1/RPV SHELL/N4C-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R20	39.3%	UT-45° S, 60° L, 60° S	The completed examination was limited to 39.3% coverage due to nozzle configuration and insulation interference.
2/1/RPV SHELL/N4D-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R20	39.3%	UT-45° S, 60° L, 60° S	The completed examination was limited to 39.3% coverage due to nozzle configuration and insulation interference.

ATTACHMENT
Dresden Nuclear Power Station, Units 2 and 3 10 CFR 50.55a Request Number I4R-17
Relief Requested In Accordance with 10 CFR 50.55a(g)(5)(iii)
--Inservice Inspection Impracticality—

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/RPV SHELL/N5A-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D2R22	28.5%	UT	The completed examination was limited to 28.5% coverage due to nozzle configuration and proximity of the insulation support bracket.
2/1/RPV SHELL/N5B-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D2R18	31.0%	UT	The completed examination was limited to 31.0% coverage due to the nozzle configuration and a stabilizer lug below the nozzle.
2/1/RPV SHELL/N9-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R18	75.0%	UT	The completed examination was limited to 75.0% coverage due to nozzle configuration.
2/1/RPV UPP HD/2-THD-FLG	VESSEL-UPPER TOP HEAD FLANGE WELD	IWB-2500-5 Volumetric	B1.40	D2R20	41.7%	UT	The completed examination coverage was limited to 41.7% due to being single sided due to flange configuration.
2/2/1302A-12/12-9	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D2R22	50.0%	UT	The completed examination coverage was limited to 50.0% due to component configuration.
2/2/1302B-12/12-8	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D2R22	50.0%	UT	The completed examination coverage was limited to 50.0% due to component configuration.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/2/1303A-8/8-9	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D2R22	50.0%	UT	The completed examination coverage was limited to 50.0% due to component configuration.
2/2/1303B-8/8-8	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D2R22	50.0%	UT	The completed examination coverage was limited to 50.0% due to component configuration.
2/1/RPV UPP HD/N18A-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D2R22	74.2%	UT	The completed examination was limited to 74.2% coverage due to nozzle configuration.
2/1/RPV SHELL/N5B-1	NOZZLE INSIDE RADIUS	IWB-2500-7 Volumetric	B3.100	D2R18	86.0%	UT	The completed examination was limited to 86.0% coverage due to a stabilizer lug below the nozzle.
2/1/RPV SHELL/M-1175D-1(IWA)	INTEGRAL WELDED ATTACHMENT	IWB-2500-13 IWB-2500-14 IWB-2500-15 Surface	B10.10	D2R20	56.0%	MT	The completed examination was limited to 56.0% coverage due to inaccessibility to the bottom of the lug.
2/1/1506-16/M-1164D-296(IWA)	INTEGRAL WELDED ATTACHMENT	IWB-2500-13 IWB-2500-14 IWB-2500-15 Surface	B10.20	D2R20	50.0%	PT	The completed examination was limited to 50.0% coverage due to the inner weld on the attachment was not accessible and could not be prepped.

ATTACHMENT
Dresden Nuclear Power Station, Units 2 and 3 10 CFR 50.55a Request Number I4R-17
Relief Requested In Accordance with 10 CFR 50.55a(g)(5)(iii)
--Inservice Inspection Impracticality—

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/3001D-6/ERV-2-203-3D(WELD)	VALVE WELD	IWB-2500-17 Volumetric	B12.40	D2P22	87.3%	VOL	The completed examination was limited to 87.3% coverage due to integrally welded cage on the valve ID.
2/2/2304-14/M-1151D-10(IWA)	INTEGRAL WELDED ATTACHMENT	IWC-2500-5	C3.20	D2P19	81.6%	MT	The completed examination was limited to 81.6% coverage due to only examining three sides since presence of pipe clamp prevented examining fourth side.
2/1/1001A-16/16-11	TEE-PIPE	IWB-2500-8(c) IWB-2500-9 IWB-2500-10 IWB-2500-11 Volumetric	R1.11	D2R19	36.0%	UT-E-45° S, 60° L	The completed examination was limited to 36.0% coverage due to weld obstruction and component configuration.
2/1/1001B-16/16-2	FLANGE-PIPE	IWB-2500-8(c) IWB-2500-9 IWB-2500-10 IWB-2500-11 Volumetric	R1.11	D2R20	85.0%	UT-E-45° S	The completed examination was limited to 85.0% coverage due to component configuration.
2/1/1005B-14/14-7	VALVE-PIPE	IWB-2500-8(c) IWB-2500-9 IWB-2500-10 IWB-2500-11 Volumetric	R1.11	D2R20	50.0%	UT-E-45° S, 60° L	The completed examination was limited to 50.0% coverage due to component configuration.
2/1/1403-10/W-103	VALVE-PIPE	IWB-2500-8(c) IWB-2500-9 IWB-2500-10 IWB-2500-11 Volumetric	R1.20	D2R20	81.0%	UT-E-45° L, 45° S, 60° L	The completed examination was limited to 81.0% coverage due to component configuration.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
2/1/1404-10/W-112	VALVE-PIPE	IWB-2500-8(c) IWB-2500-9 IWB-2500-10 IWB-2500-11 Volumetric	R1.20	D2R20	85.0%	UT-E-45° S, 45° L, 60° L	The completed examination was limited to 85.0% coverage due to component configuration.

Table 2: Dresden Nuclear Power Station, Unit 3 Fourth Inservice Inspection Interval Limited Coverage Components

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
3/1/RPV SHELL/3-SC1A-VERT	LONGITUDINAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	85.0%	UT-45	The completed examination coverage was limited to 85.0% due to proximity of the jet pump diffuser.
3/1/RPV SHELL/3-SC1B-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	39.8%	UT-45 S,UT-70 RL	The completed examination coverage was limited to 39.8% due to proximity of the shroud repair tie rod.
3/1/RPV SHELL/3-SC1C-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	83.4%	UT-45 S UT-70 RL	The completed examination coverage was limited to 83.4% due to proximity of the jet pump diffuser.
3/1/RPV SHELL/3-SC2A-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	75.8%	UT-45 S UT-70 RL	The completed examination coverage was limited to 75.8% due to the tie-rod stabilizer bracket.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
3/1/RPV SHELL/3-SC2C-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	84.2%	UT-45 S UT-70 RL	The completed examination coverage was limited to 84.2% due to proximity of the core spray piping.
3/1/RPV SHELL/3-SC3A-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	22.6%	UT-45 S UT-70 RL	The completed examination coverage was limited to 22.6% due to proximity of the feedwater sparger and core spray downcomer.
3/1/RPV SHELL/N19A-2	NOZZLE-VESSEL	IWB-2500-2 Volumetric	B3.90	D3R20	53.0%	UT-60° L, 60° S	The completed examination was limited to 53.0% coverage due to nozzle configuration and insulation support interference.
3/1/RPV SHELL/3-SC3B-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	66.0%	UT-45 S UT-70 RL	The completed examination coverage was limited to 66.0% due to proximity of the shroud repair tie rod and core spray piping bracket.
3/1/RPV SHELL/3SC3C-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	55.7%	UT-45 S UT-70 RL	The completed examination coverage was limited to 55.7% due to proximity of the core spray piping, feedwater sparger and specimen bracket.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
3/1/RPV SHELL/3-SC3D-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	71.8%	UT-45 S UT-70 RL	The completed examination coverage was limited to 71.8% due to core spray piping and feedwater sparger.
3/1/RPV SHELL/3-SC4B-VERT	LONGITUDENAL WELD	IWB-2500-2 Volumetric	B1.12	D3R22	80.2%	UT-45 S UT-70 RL	The completed examination coverage was limited to 80.2% due to proximity of the dryer bracket and the mismatch between the RPV and flange for this examination.
3/1/RPV SHELL/N19B-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R18	38.0%	UT-45° S, 60° L	The completed examination was limited to 38.0% coverage due to nozzle configuration and an insulation support ring.
3/1/RPV SHELL/N1A-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R18	25.0%	UT-60° S, 70° S, 60° L	The completed examination was limited to 25.0% coverage due to nozzle configuration.
3/1/RPV SHELL/N1B-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R20	31.3%	UT-60° S, 70° S	The completed examination was limited to 31.3% coverage due to nozzle configuration.
3/1/RPV SHELL/N2B-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R20	41.7%	UT-60° S	The completed examination was limited to 41.7% coverage due to nozzle configuration.

ATTACHMENT
Dresden Nuclear Power Station, Units 2 and 3 10 CFR 50.55a Request Number I4R-17
Relief Requested In Accordance with 10 CFR 50.55a(g)(5)(iii)
--Inservice Inspection Impracticality—

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
3/1/RPV SHELL/N2D-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R18	42.0%	UT-60° S, 60° L	The completed examination was limited to 42.0% coverage due to nozzle configuration.
3/1/RPV SHELL/N2E-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R18	42.0%	UT-60° S, 70° S, 60° L	The completed examination was limited to 42.0% coverage due to nozzle configuration.
3/1/RPV SHELL/N2G-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R20	41.7%	UT-60° S	The completed examination was limited to 41.7% coverage due to nozzle configuration.
3/1/RPV SHELL/N3A-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R21	31.0%	UT-60° S, 60° L	The completed examination was limited to 31.0% coverage due to nozzle configuration.
3/1/RPV SHELL/N3B-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R21	31.0%	UT-60° S, 60° L	The completed examination was limited to 31.0% coverage due to nozzle configuration.
3/1/RPV SHELL/N3C-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R18	35.0%	UT-60° L, 70° S, 60° S	The completed examination was limited to 35.0% coverage due to nozzle configuration and thermocouples.
3/1/RPV SHELL/N3D-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R19	40.8%	UT-60° L, 70° S, 60° S	The completed examination was limited to 40.8% coverage due to nozzle configuration.
3/1/RPV SHELL/N4A-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R20	36.3%	UT-45° S, 60° L, 60° S	The completed examination was limited to 36.3% coverage due to nozzle configuration.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
3/1/RPV SHELL/N4B-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R20	36.3%	UT-45° S, 60° L, 60° S	The completed examination was limited to 36.3% coverage due to nozzle configuration.
3/1/RPV SHELL/N4C-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R20	36.3%	UT-45° S, 60° S, 70° L	The completed examination was limited to 36.3% coverage due to nozzle configuration.
3/1/RPV SHELL/N4D-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R20	36.3%	UT-45° S, 60° S, 60° L	The completed examination was limited to 36.3% coverage due to nozzle configuration.
3/1/RPV SHELL/N5A-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R21	29.0%	UT-60° L, 60° S	The completed examination was limited to 29.0% coverage due to the nozzle configuration and stabilizer bracket.
3/1/RPV SHELL/N5B-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R18	36.0%	UT-60° S, 60° L	The completed examination was limited to 36.0% coverage due to nozzle configuration.
3/1/RPV SHELL/N9-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R18	62.0%	UT-45° S, 60° L	The completed examination was limited to 62.0% coverage due to nozzle configuration and insulation support ring.
3/1/RPV UPP HD/3-THD-FLG	VESSEL-UPPER TOP HEAD FLANGE WELD	IWB-2500-5 Volumetric	B1.40	D3R19	72.0%	UT	The completed examination was limited to 72.0% coverage due to flange configuration.

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
3/1/RPV UPP HD/N18A-2	NOZZLE-VESSEL	IWB-2500-7 Volumetric	B3.90	D3R19	66.6%	UT-45° S, 60° S, 60° L	The completed examination was limited to 66.6% coverage due to nozzle configuration.
3/1/RPV UPP HD/N18B-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R19	66.6%	UT-45° S, 60° S, 60° L	The completed examination was limited to 66.6% coverage due to nozzle configuration.
3/1/RPV UPP HD/N8-2	VESSEL-NOZZLE	IWB-2500-7 Volumetric	B3.90	D3R19	74.3%	UT-60° S, 60° L	The completed examination was limited to 74.3% coverage due to nozzle configuration.
3/2/1302A-12/12-8	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D3R20	37.8%	UT	The completed examination was limited to 37.8% coverage due to nozzle configuration.
3/2/1302B-12/12-9	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D3R20	37.8%	UT	The completed examination was limited to 37.8% coverage due to component configuration.
3/2/1303A-8/8-8	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D3R21	50.0%	UT	The completed examination was limited to 50.0% coverage due to component configuration.
3/2/1303B-8/8-9	ISO CONDENSER NOZZLE WELD	IWC-2500-4 Volumetric	C2.21	D3R21	52.3%	UT	The completed examination was limited to 52.3% coverage due to component configuration.

ATTACHMENT
Dresden Nuclear Power Station, Units 2 and 3 10 CFR 50.55a Request Number I4R-17
Relief Requested In Accordance with 10 CFR 50.55a(g)(5)(iii)
--Inservice Inspection Impracticality—

Component ID	Weld Description	Exam Requirements	Item Number	Outage Examined	Actual Coverage	Exam Type	Remarks
3/1/RPV SHELL/M-1211D-1(IWA)	INTEGRAL WELDED ATTACHMENT	IWB-2500-13 IWB-2500-14 IWB-2500-15 Surface	B10.10	D3R19	60.0%	PT	The completed examination was limited to 60.0% coverage due to being only able to examine three sides of the lug.
3/1/0202A-28/M-1193D-1002(IWA)	INTEGRAL WELDED ATTACHMENT	IWB-2500-13 IWB-2500-14 IWB-2500-15 Surface	B10.20	D3R18	88.0%	PT	The completed examination was limited to 88.0% coverage due to presence of sway brace which reduced accessibility.
3/2/3204B-18/18-1	VALVE-TEE	IWB-2500-8(c) IWB-2500-9 IWB-2500-10 IWB-2500-11 Volumetric	R1.11	D3R21	78.9%	UT-E-45° S	The completed examination was limited to 78.9% coverage due to presence of saddle weldment, weld-o-let and valve configuration.
3/1/3001B-6/ERV-3-203-3B(WELD)	VALVE WELD	IWB-2500-17 Volumetric	B12.40	D3P22	89.4%	VOL	The completed examination was limited to 89.4% coverage due to integrally welded cage on valve ID.
3/1/1302-14/14-9(A)	FLANGE-PIPE	IWB-2500-8(c) IWB-2500-9 IWB-2500-10 IWB-2500-11 Volumetric	R1.20	D3R21	50.0%	UT-E-60° L, 45° S	The completed examination was limited to 50.0% coverage due to flued head configuration.