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January 17, 1975

REGULATORY DOCKET FILE COPY

Mr. Edson G. Case
Acting Director
Directorate of Licensing
Office of Regulation
U.S. Atomic Energy Commission
Washington, D.C. 20545



Subject: Dresden Station Unit 2
Recirculation Piping Repair Program
AEC Dkt. 50-237

Dear Mr. Case:

As discussed in my letter to you dated December 27, 1974, the 4-inch diameter reactor water recirculation pump discharge valve bypass piping will be replaced during the current Dresden Unit 2 outage. It is planned to replace the portion of piping between the 4-inch bypass valve and the 4 x 28 inch weld-o-let on the discharge side of the pump discharge valve using essentially the same procedure as described in a submittal dated September 23, 1974.

This procedure for isolating the 4 x 28 inch weld-o-let will be used with the following modifications.

1. Primary containment will not be required.
2. On "A" recirculation loop, a portion of piping was replaced in September and only the freeze plug will be required to complete the replacement to the 4-inch bypass valve.

Of the two modifications to the procedure, only the first present any potential safety considerations beyond those reviewed in the September 23, 1974 submittal. We have reviewed this modification; and based on the following considerations, have concluded that the associated, postulated hazards are no greater than discussed in the September 23, 1974 submittal for the repair program with primary containment.

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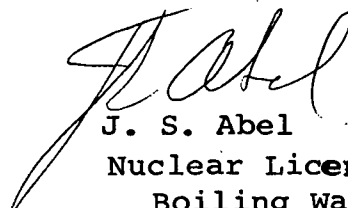
1. The primary system coolant will be maintained below 85° F which is lower than the temperature described in the "Safety Evaluation for Recirculation Line Repair" in the September 23, 1974 submittal. With the reactor head removed and the stud detentioned, the minimum flange temperature Technical Specification limit is not applicable.
2. Since the reactor is open to the secondary containment for refueling, no change in secondary containment airborne radioactivity will result in the event of a postulated plug failure without primary containment. The release of radioactivity to the environment will be unchanged from release which would occur with the reactor shutdown and the head removed for refueling. Further, the reactor water activity is presently 6×10^5 pCi/l which is a factor of eight less than used in the evaluation in the September 23, 1974 submittal.

The repair program described in the September 23, 1974 submittal and modified herein is essentially a maintenance procedure. No Technical Specification changes are involved and 10CFR50.59 does not cover the question clearly. However, Commonwealth Edison believes the spirit of 10CFR50.59 suggests that matters such as this one should be brought to the attention of the AEC in a timely manner for review by the Staff. We expect that the review will confirm Commonwealth Edison's judgment that no real consideration of increased risk is involved. Use of the proposed repair program at Dresden Unit 2 will be withheld pending your approval.

Both the Onsite and Offsite Review functions for Dresden Station have approved this submittal.

One signed original and 39 copies are submitted for your review.

Very truly yours,



J. S. Abel

Nuclear Licensing Administrator
Boiling Water Reactors

Att.