

Commonwealth Edison Company

72 WEST ADAMS STREET * CHICAGO, ILLINOIS 60690

June 2, 1969

Mr. Lawrence D. Low, Director
Division of Compliance
U.S. Atomic Energy Commission
Washington, D.C. 20545

Your reference 50-237

Dear Mr. Low:

Your letter of May 6 discusses a report you had received from your Region III Compliance Office (Chicago) regarding our plans for testing the piping in certain nuclear systems in the Dresden Unit 2 facility, and requests that we provide you with the following information within 30 days of receipt of your letter:

- "a. A list of all nuclear systems designed to the USA Standard B31.1.0 Code for Pressure Piping which you do not plan to hydrostatically test at 150 percent of the design pressures listed, or implied, in your amended application.
- "b. The bases for limiting the hydrostatic test pressure, including a formal code interpretation if appropriate. If the proposed USA Standard B31.7 Code is used as part of the bases, please provide the necessary design details to support any reduction in test pressure."

In reply to (a) above, the following list is supplied:

Systems

- Main Steam
- Extraction Steam
- Reactor Feed
- Reactor Recirculating
- Core Spray
- Isolation Condenser
- Low Pressure Coolant Injection (LPCI)
- Reactor Cleanup

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Systems

Shutdown Reactor Cooling
Standby Liquid Control
Control Rod Drive
High Pressure Coolant Injection (HPCI)

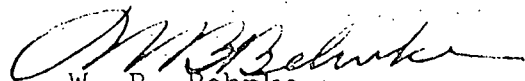
To provide an answer for (b), we refer you to Section 137, pages 52 and 53 of the USA Standard Code for Pressure Piping, B31.1.0 - 1967, specifically calling attention to paragraphs 137.4.1 (a) and (b) which state:

"(a) The test pressure for the piping shall not exceed the maximum test pressure of any vessels or components in the piping system.

"(b) The hydrostatic test pressure of a piping system shall be 1.5 times the design pressure unless a lesser pressure is indicated by Par. 137.4.1 (a)."

The reactor pressure vessel to which all of the above listed piping systems are attached was designed and built to Section III of the ASME Boiler and Pressure Vessel Code. The Code specifies that the hydrostatic test pressure for the vessel shall be 1.25 times its design pressure. The attached piping systems, designed, fabricated and installed to comply with USA Standard B31.1.0 Piping Code, will likewise be hydrostatically tested at 1.25 times design pressure per paragraphs 137.4.1 (a) and (b) of B31.1.0.

Sincerely yours,



W. B. Behnke
Assistant to the President

ECB/jmn