



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

April 26, 1991

Dr. Thomas E. Murley, Director
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
 Inservice Inspection Program Update
NRC Docket Nos. 50-237 and 50-249

References: (a) Conference Call between CECO (M. Richter, et al.) and
 NRR (B. Siegel, et al.) on April 23, 1991.

(b) Proposed Rule on Codes and Standards for Nuclear Power
 Plants, 56 Fed. Reg. 3796, dated January 31, 1991.

Dr. Murley:

As discussed with your staff in the Reference (a) teleconference, Commonwealth Edison Company (CECo) will begin preparing the Dresden Station Inservice Inspection (ISI) Program update, for the third ten-year interval, in the near future. The current ten-year interval for the ISI Program concludes on March 1, 1992. In accordance with 10 CFR 50.55a, the program for the third ten-year interval must comply with the 1986 Edition of ASME Section XI (with no Addenda). However, at this time it is CECO's understanding that the 1989 Edition of Section XI (with no Addenda) has been reviewed and accepted by the Nuclear Regulatory Commission (NRC), and is incorporated in currently proposed rulemaking for 10 CFR 50.55a (Reference (b)). It is also CECO's understanding that the 1989 Addenda of Section XI is currently under NRC review.

CECo has performed a review of the 1989 Edition of Section XI and determined that it's restructuring has clarified many of the requirements in the 1986 Edition. Additionally, CECO has reviewed the 1989 Addenda of Section XI and determined that it clarifies and consolidates the requirements for repair, replacement and pressure testing.

With this letter, CECO is requesting approval to update the Dresden Station ISI Program for the third ten-year interval to the 1989 Edition of ASME Section XI overall, and to the 1989 Edition through the 1989 Addenda for Articles IWX-4000 (Repair), IWX-5000 (Pressure Testing) and IWX-7000 (Replacement). CECO believes that the use of the aforementioned Edition and Addenda of Section XI for the ten-year interval update will provide the basis for an enhanced ISI Program.

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Please contact this office should further information be required.

Respectfully,

Milton H. Richter

M. H. Richter

Nuclear Licensing Administrator

cc: A. B. Davis - Regional Administrator, Region III
B. L. Siegel - NRR Project Manager
D. E. Hills - Senior Resident Inspector, Dresden
G. Johnson - NRR Technical Staff