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Downers Grove, Illinois 60515

February 18, 1992

Dr. Thomas E. Murley
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 Plan (ISI)
Revision 0 of the Third Ten-Year Inspection Interval ISI Plan
NRC Docket Nos. 50-237 and 50-249

Reference: R. Barrett (NRC) memo to T. Kovach (CECo),
dated January 28, 1992.

Dear Dr. Murley:

The purpose of this letter is to transmit Revision 0 of Dresden Station's Third Ten-Year Inservice Inspection (ISI) Plan. This plan outlines the requirements for the Non-Destructive Examination (NDE) of Class 1, 2, and 3 pressure retaining components and their supports at Dresden Station Units 2 and 3. The plan will be effective from March 1, 1992 through and including February 28, 2002, which represents the Third Ten-Year Interval of the Inservice Inspection Program for Dresden Station.

Dresden's ISI Program was developed in accordance with the requirements delineated in the July 31, 1991 issue of 10 CFR 50.55a and the 1989 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, Subsections IWA, IWB, IWC, IWD, and IWF, for Inspection Program B. Use of the 1989 Edition of ASME Section XI as the basis for development of this program was found to be acceptable by NRR in the referenced letter.

The key features of Dresden's ISI Plan are the Introduction and Plan Description, Relief Requests, Technical Approach and Positions, and Summary Tables. The details of the Inservice Inspection Program are addressed in other documents that are available at Dresden Station. These documents include but are not limited to the following: component detail drawings, piping and instrumentation diagrams, piping isometric drawings, a component listing of each weld, valve, support, procedures, schedules, and other records required to define and execute the Inservice Inspection Plan at Dresden Station.

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It should be noted that a limited number of Relief Requests (RR) and Technical Approach and Positions (TA&P) presented in Dresden ISI's Program were previously approved under the Second Ten-Year Inspection Interval ISI Program. A cross reference between the old Relief Request numbers and the new Relief Request (RR) or Technical Approach and Position (TA&P) numbers are presented below.

<u>DESCRIPTION</u>	<u>OLD RR NO</u>	<u>NEW RR OR TA&P NO</u>
Examination of pressure retaining welds in reactor vessel.	CR-01	CT-01
Inspection of Standby Liquid Control nozzle inner radius.	CR-02	CR-01
Inaccessible welds located at containment penetrations.	CR-03	CR-02
Inspection of branch pipe connections and nozzle-to-vessel welds designed with reinforcement saddles.	CR-04, CR-07	CR-03
Use of existing calibration blocks for ultrasonic examination of Class 1 and 2 components.	CR-08	CR-04
Inspection of Low Pressure Coolant Injection tubesheet-to-shell welds.	CR-09	CR-05
Adoption of Code Case N-498 for Class 1 and 2 hydrostatic pressure testing.	CR-13	PT-01
System leakage test pressure for the disassembly and reassembly of Class 1 mechanical connections.	CR-12	PR-02

It is requested that NRR expedite the review of specific Relief Requests and Technical Approach & Positions. Dresden Station is seeking advanced acceptance in order to incorporate the requirements specified in the documents into Dresden's ASME Section XI Repair/Replacement procedures. These procedures are currently being updated to meet the requirements of the Third Ten Year Interval ISI Plan. Expedited acceptance is requested for the following documents:

ISI Technical Approach and Position CT-02:

Exemption of piping, valves, and fittings (NPS 1 and smaller), and their associated supports from the requirements of Article IWA-4000.

ISI Relief Request CR-11:

Use of the 1989 Addenda of Section XI to govern Repair Procedures (IWX-4000), System Pressure Tests or Inservice Inspection Requirements for Snubbers (IWX-5000), and Replacements (IWX-7000).

Pressure Testing Relief Request PR-02:

System Leakage Test pressure for the disassembly and reassembly of Class 1 mechanical connections.

Pressure Testing Relief Request PR-14:

Alternate testing for Class 1 and Class 2 repaired/replaced components.

Please contact this office should further information be required.

Sincerely,



Peter L. Piet
Nuclear Licensing Administrator

Attachment: Dresden Station Units 2 and 3
Third Ten-Year Interval, Inservice Inspection Plan,
Revision 0

cc: A.B. Davis - Regional Administrator, RIII
B.L. Siegel - NRR Project Manager
W.G. Rogers - Senior Resident Inspector