



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

February 28, 1992

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Third Ten-Year Inspection Interval
Inservice Testing Plan, Revision 0
NRC Docket Nos. 50-237 and 50-249

Reference: Teleconference between CECO (M. Richter) and
USNRC (B. Siegel), dated January 23, 1992

Dear Dr. Murley:

The purpose of this letter is to transmit the subject Inservice Testing (IST) Plan for Dresden Station Units 2 and 3. This plan outlines the requirements for the Inservice Testing of Class 1,2, and 3 pumps and valves at Dresden Nuclear Power Station. 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 Testing Program at Dresden Station. Dresden's IST Plan was developed in accordance with the requirements delineated in the July 31, 1991 issue of 10 CFR 50.55a and the 1986 Edition of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, Subsections IWP and IWV.

Although Dresden's IST Plan is presented in an updated format, there are no significant changes between this plan and Revision 4 of the Second Ten-Year Interval IST Plan. Any minor technical differences between Revision 0 of the Third Ten-Year Interval IST Plan and Revision 4 of the Second Ten-Year Interval IST Plan are delineated in Attachment A. The Safety Evaluation Report (SER) for Revision 3 of the IST Program was received on July 25, 1990. Revision 4 incorporated the comments of the SER for Revision 3 and Generic Letter 89-04. As stated in the referenced teleconference, the SER for Revision 4 to Dresden's IST Plan is expected in the near future. Attachment C, Process Used to Develop the IST Plan, provides Dresden's response to questions raised by members of your Staff during the referenced teleconference regarding Dresden's Ist Plan.

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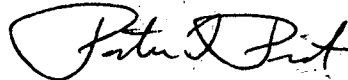
Attachment B provides a Cross-Reference Between Relief Requests, Dresden Additional Information and Methodology, Technical Approach and Positions and Cold Shutdown Justifications. This matrix provides a brief outline of the overall changes presented in Revision 0 of Dresden's Third Ten-Year Ist Plan. Attachment D provides Revision 0 of Dresden Station's Third Ten-Year Inspection Interval Inservice Testing Plan.

During the Plan update process, eleven (11) relief requests, as indicated below, were added or were significantly revised such that approval is required. Commonwealth Edison therefore requests an expedited staff review of the following relief requests:

RV-03A, RV-03C, RV-23E, RV-23G, RV-23H, RV-24A, RV-25A,
RV-47A, RV-57A, RV-66A, RP-19A.

Please direct any questions or comments to this office.

Sincerely,



Peter L. Piet
Nuclear Licensing Administrator

- Attachments:
- A-Summary of Changes to the IST Plan
 - B-Cross-Reference Between Relief Requests, Dresden Additional Information and Methodology, Technical Approach and Positions and Cold Shutdown Justifications
 - C-Process to Develop Dresden's IST Plan
 - D-Third Ten-Year Inspection Interval Inservice Testing Plan for Dresden Nuclear Power Station Units 2 and 3 Revision 0.

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

ATTACHMENT A

SUMMARY OF CHANGES TO THE IST PLAN

The following format changes have been made to the IST Plan:

1. A description of each pump and valve has been added to the Pump and Valve list.
2. The relief requests have been reformatted and new numbers assigned. For pumps, PR-XX has been changed to RP-NNA, where NN is the first two numbers of the system number and A is a unique, sequential character. Similarly for valves, VR-XX has been changed to RV-NNA.
3. Dresden Additional Information and Methodology (DAIMs) were redesignated as either Technical Approach and Positions (TA&Ps) or Cold Shutdown Justifications (CSJ). The TA&Ps are numbered TP-NNA for pumps and TV-NNA for valves. The CSJ's are numbered CS-NNA and apply to valves only. In some specific cases DAIMs were made into relief requests.
4. Attachment B, Cross Reference Between Relief Requests, DAIMs, TA&Ps and CSJs provides a summary of changes to the technical content of the relief request, TA&P and/or CSJ.
5. In addition to the Attachment B changes, the following changes were made to the valve listings:
 - a. The 3-0263-52 valve number was changed to 3-0220-52.
 - b. The 2/3-5741-062 valve number was changed to 2/3-5741-62.
 - c. The 3-1699-85A valve number was changed to 3-1699-85.
 - d. The 3-0220-83A,B,C & D valve numbers were changed to 3-0220-85A,B,C & D.
 - e. The line size of the 3-3930-501 line was changed from 8" to 6" due to a modification.
 - f. The 2(3)-4799-567, 569 & 570 valves were deleted from the program because the lines were cut and capped.
 - g. The 2(3)-2001-3 valve changed from Category A to Category B since the 2(3)-2001-5 and 2(3)-2001-6 valves are specified as containment isolation valves per the Technical Specifications and FSAR.
 - h. The PIT test was eliminated from the 2(3)-2301-31(32) valves since they do not have Control Room indication.
 - i. The 2-1699-59A(59B) Torus Level Instrument valves were deleted and the 2-1699-85(96) Torus Level Instrument valves were added. These manual valves isolate the Torus Level indicator.
 - j. The 2(3)-0220-105A through E valves were reclassified from safety-related to class 3 valves.

ATTACHMENT A
(continued)

- k. The 2(3)-1301-36, Condensate Transfer Makeup to the Isolation Condenser check valves and the 2(3)-4107-501, Diesel Fire Makeup to the Isolation Condenser check valves were reclassified from class 3 to non-safety related valves.
 - l. The 2(3)-4399-73, Clean Demin to the Isolation Condenser Check Valve, and the 2(3)-4399-74, Clean Demin to the Isolation Condenser MO valves were added. These two (2) valves are non-safety related, but are important in order to use clean demin instead of well water in the Isolation Condenser.
 - m. The 2(3)-2301-40, HPCI Min Flow Check valves, were reclassified from 3 to 2.
 - n. The 2(3)-0299-68A through E vacuum breakers have been added to the program as Class 2, Category C valves.
 - o. The 2(3)-3999-252 and 2(3)-3999-253 valves have been deleted from the program. These valves were reclassified from Class 3 to non-safety related valves. These check valves are in the lines supplying service/diesel cooling water to the Emergency Room Coolers.
 - p. The 2(3)-1601-91, Vent to Reactor Building Exhaust System valves and 2(3)-1601-92, Vent to Main Chimney valves have been added to the program due to the hardened vent modification. These valves are non-safety related valves.
 - q. The Target Rock valve was erroneously removed from VR-4 within Revision 4 of the Second Ten-Year Plan. Dresden Station has determined that relief from the ASME Code is necessary. The Target Rock valve has been added to RV-02B, as originally approved in the Revision 3 SER.
6. Attachment B provides a cross-reference between Revision 4 of the Second Ten-Year IST plan and Revision 0 of the Third Ten-Year IST plan.

ATTACHMENT B

Cross-Reference Between Relief Requests, DAIMs, TA&Ps and CSJs (pg. 1 of 3)

PUMPS

| <u>Current IST Relief Request</u> | <u>Rev. 4 Relief Request</u> | <u>Changes</u> |
|-----------------------------------|------------------------------|---|
| RP-00A | PR-1 | Clarified that the Diesel Oil Transfer pumps are reciprocating pumps. |
| RP-00B | PR-2 | No technical changes. |
| RP-11A | PR-6 | No technical changes. |
| RP-19A | | NEW |
| RP-23A | PR-7 | No technical changes. |
| RP-52A | PR-4 | No technical changes. |
| | PR-3 | DELETED: 1986 Code allows quarterly testing. |
| | PR-5 | DELETED: D/G Cooling Water flow indicators installed. |

| <u>Current IST TA&P</u> | <u>Rev. 4 DAIM</u> | <u>Changes</u> |
|-----------------------------|--------------------|-----------------------|
| TP-00A | DAIM-P5 | No technical changes. |
| TP-00B | DAIM-P1 | No technical changes. |
| | DAIM-P4 | DELETED |

VALVES

| <u>Current IST Relief Request</u> | <u>Rev. 4 Relief Request</u> | <u>Changes</u> |
|-----------------------------------|------------------------------|--|
| RV-00A | VR-6 | No technical changes. |
| RV-00B | VR-24 | No technical changes. |
| RV-00C | VR-26 | No technical changes. |
| RV-02A | VR-3 | No technical changes. |
| RV-02B | VR-4 | See Attachment A, Section 5.q. |
| RV-02C | VR-21 | No technical changes. |
| RV-02D | VR-23 | No technical changes. |
| RV-02E | VR-16 | No technical changes. |
| RV-02F | VR-17 | No technical changes. |
| RV-03A | VR-9 | Testing moved to Reactor Refuel Outages. |
| RV-03B | VR-1 | No technical changes. |
| RV-03C | VR-8 | Testing moved to Reactor Refuel Outages. |
| RV-11A | VR-12 | No technical changes. |
| RV-13A | VR-11 | No technical changes. |
| RV-14A | | NEW (Approved per Generic Letter 89-04) |
| RV-14B | VR-13 | Revised to reflect CS-00B |

ATTACHMENT B

Cross-Reference Between Relief Requests, DAIMs, TA&Ps and CSJs
(pg. 2 of 3)

| <u>Current IST Relief Request</u> | <u>Rev. 4 Relief Request</u> | <u>Changes</u> |
|--|--|--|
| RV-15A RV-15B | VR-14 | NEW (Approved per Generic Letter 89-04) Revised to reflect CS-00B |
| RV-23A RV-23B RV-23C RV-23D | VR-15 VR-22 VR-18 VR-19 | No technical changes. No technical changes. Revised to reflect CS-00B No technical changes. |
| RV-23E RV-23F RV-23G RV-23H | DAIM-V11 | Testing moved to Reactor Refuel Outages. NEW (Approved per Generic Letter 89-04) NEW NEW |
| RV-24A | DAIM-V18 | Testing moved to Reactor Refuel Outages. |
| RV-25A | DAIM-V19 | Testing moved to Reactor Refuel Outages. |
| RV-47A | DAIM-V21 | Testing moved to Reactor Refuel Outages. |
| RV-57A | | NEW |
| RV-66A | | NEW |
| | VR-20 | DELETED: same as RV-00C |

ATTACHMENT C

Process Used to Develop Dresden's IST Plan

This attachment is provided in response to the NRC's Request for Additional Information (referenced teleconference) on the developmental process used in preparing the Dresden IST Plan.

1. The following list contains the documents used in developing the IST Plan:
 - a. Technical Specifications
 - b. Final Safety Analysis Report
 - c. Piping and Instrument Diagrams (P&ID's)
 - d. Master Equipment List (MEL)
 - e. Generic Letter 89-04
 - f. SER's from past IST Programs
2. For determining if a component should be in the IST Program, Section XI of the 1986 Edition of the ASME Code was consulted. Subsections IWP-1000 and IWV-1000 provide the methodology for selecting pumps and valves. These subsections specify testing the ASME Class 1, 2 and 3 pumps and valves that are required to perform a specific function in shutting down a reactor or in mitigating the consequences of an accident. Additionally, the pumps also have to be powered by an emergency power source. Since Dresden Units 2 and 3 were built prior to the establishment of ASME Class 1, 2 or 3 components, the system classifications for the Inservice Testing Program were based on the requirements set forth in 10 CFR 50 and Regulatory Guide 1.26.

Additionally, safety-related pumps and valves are included in the IST Plan. These pumps and valves were put in the IST Plan in anticipation of the issuance of Generic Letter 89-04. In addition to safety-related pumps and valves, some non-safety related pumps and valves have been included in the IST Plan per the NRC's request (i.e. Fuel Pool Cooling).
3. The basis for testing required by the IST Plan can be found in the 1986 Edition of the ASME Code, Section XI, Subsections IWP-3000, Inservice Test Procedures and IWV-3000, Test Requirements.
4. The basis for categorizing valves can be found in IWV-2100, Categories of Valves.
 - a. Category A valves are valves for which seat leakage is limited to a specific maximum amount in the closed position for fulfillment of their function. These include all Appendix J and Pressure Isolation Valves.
 - b. Category B valves are valves which seat leakage in the closed position is inconsequential for fulfillment of their function.
 - c. Category C valves include all safety, relief and check valves.
 - d. Category D valves include all explosively actuated valves and rupture disks.
5. In order to keep the IST Plan current, the IST Coordinator reviews and signs all modifications and minor modifications. This is coordinated by Dresden Administrative Procedure (DAP) 5-1, Plant Modification Program.