



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

*Docket File*

December 17, 1992

Docket Nos. 50-237  
and 50-249

Mr. Thomas J. Kovach  
Nuclear Licensing Manager  
Commonwealth Edison Company-Suite 300  
OPUS West III  
1400 OPUS Place  
Downers Grove, Illinois 60515

Dear Mr. Kovach:

SUBJECT: SAFETY EVALUATION (SE) OF THE INSERVICE TESTING PROGRAM RELIEF  
REQUESTS FOR PUMPS AND VALVES, DRESDEN NUCLEAR POWER STATION,  
UNITS 2 AND 3 (TAC NOS. M82898 AND M82899)

In a letter dated February 28, 1992, you submitted your updated inservice testing (IST) program for the third ten-year interval for the Dresden Nuclear Power Station, Units 2 and 3. The interval is from March 1, 1992, to February 28, 2002. A Safety Evaluation (SE) concerning eleven of the relief requests was transmitted to you in a letter dated September 11, 1992. The staff's SE of the remaining reliefs requested in your February 28, 1992, submittal is included as Enclosure 1.

Title 10 of the Code of Federal Regulations, Section 50.55a, requires that inservice testing of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda, except where alternatives are authorized or relief is granted by the Commission pursuant to paragraphs (a)(3)(i), (a)(3)(ii), or (f)(6)(i). In order to obtain authorization or relief, the licensee must demonstrate that (1) the proposed alternatives provide an acceptable level of quality and safety, (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety, or (3) conformance is impractical for its facility. Guidance on acceptable alternatives to Section XI requirements was provided by NRC in Generic Letter (GL) 89-04 for certain aspects of IST.

The NRC technical staff, with technical assistance from EG&G Idaho, Inc. (EG&G), has reviewed the information concerning the IST program relief requests submitted for Dresden. The staff adopts the evaluations and conclusions contained in the attached Technical Evaluation Report (TER) prepared by EG&G, except as specified in the SE. Table 1 of the SE presents a summary of the relief request determinations for your February 28, 1992, submittal.

The staff is granting relief from certain testing requirements that are impractical to perform and authorizing proposed alternatives where compliance would result in a hardship without a compensating increase in safety or where

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*AP*  
*[Signature]*  
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Mr. Thomas J. Kovach  
Commonwealth Edison Company

Dresden Nuclear Power Station  
Unit Nos. 2 and 3

cc:

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December 17, 1992

the alternative testing provides an acceptable level of quality and safety. The IST program relief requests for Dresden in the February 28, 1992, submittal are acceptable for implementation provided (1) the anomalies identified in Appendix A are addressed within one year of the date of this SE, and (2) the procedural or program changes covered in the anomalies are completed within one year of the date of this SE, or by the end of the next refueling outage, whichever is later, or by the schedule specified in Section 2.2 if required. The granting of relief or authorization of alternatives is based upon the fulfillment of any commitments made by you in the basis for each relief request and the alternatives proposed.

Program changes involving new or revised requests for relief or authorization of alternatives should not be implemented prior to approval by the NRC. New or revised requests that meet the positions in GL 89-04, Attachment 1, should be submitted to the NRC but can be implemented provided the guidance in GL 89-04, Section D, is followed. Program changes that add or delete components from the IST program should also be provided to the NRC staff.

This action completes the staff's technical review of this issue. If you have any questions or require clarification of the staff's SE or the contractors TER, please contact Byron Siegel, the Dresden Project Manager.

Sincerely,

Original signed by  
John F. Stang for:

James E. Dyer, Director  
Project Directorate III-2  
Division of Reactor Projects III/IV/V  
Office of Nuclear Reactor Regulation

Enclosure:  
Safety Evaluation w/attachments

cc w/enclosure:  
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