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March 18, 1993

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
Response to Safety Evaluation Related to Revision
4 of the Inservice Testing (IST) Plan
NRC Docket Nos. 50-237 and 50-249

- References:
- (1) R. Barrett letter to T. Kovach, dated April 2, 1992
(TAC Nos. M81165 and M81166).
 - (2) R. Barrett letter to T. Kovach, dated September 11, 1992
(TAC Nos. M82986 and M82987).
 - (3) J. Dyer letter to T. Kovach, dated December 17, 1992
(TAC Nos. M82898 and M82899).
 - (4) M. Richter letter to T. Murley, dated July 17, 1991.
 - (5) P. Piet letter to T. Murley, dated February 28, 1992.

Dr. Murley:

Revision 0 of the Dresden Station Third 10-Year IST Plan was submitted to the NRC Staff in February of 1992 (Reference (5)). In Reference (1), Commonwealth Edison (CECo) received the NRC Staff Safety Evaluation Report (SER) for Revision 4 of the NRC Second 10-Year IST Program, that had been submitted to the NRC Staff in July of 1991 (Reference (4)). The Reference (1) SER required Commonwealth Edison (CECo) to respond to seven issues regarding the program by April 1, 1993. In the interim, in December of 1992, CECo received the SER for Revision 0 of the Third 10-Year Interval IST Plan (Reference (3)). Six of the seven issues mentioned in Reference (1) were also identified as requiring a

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response in Reference (3). In an effort to eliminate redundancy, these six issues will be addressed in Dresden Station's response to Reference (c). The other remaining issue from Reference (1) is addressed below.

A concern was raised in Reference (1) regarding Dresden Additional Information/Methodology (DAIM) V-2 being in conflict with the Dresden response to Generic Letter (GL) 87-06. DAIM is a listing of Pressure Isolation Valves (PIV) at Dresden Station. Reference (1) included a request by the NRC Staff to review the test methodology of these valves to determine if any revisions to the IST plan were necessary.

In the interim, DAIM V-2 has been replaced by Technical Approach and Position for Valves (TV)-OOB in the Third 10-Year Interval IST Plan. A review of DAIM V-2 and TV-OOB revealed that all PIVs committed to in the Dresden response to GL 87-06 were not identified within the DAIM (V-2) nor TV-OOB. However, a review of the IST Plan found that all required PIVs, including those not listed in DAIM V-2 or TV-OOB, are being tested per GL 87-06. Attachment 1 to this letter provides further details on this item.

Attachment 1 is a listing of each item from Reference (1) that requires a response and the corresponding items from Reference (3). The Reference (1) concerns pertaining to DAIM V-2 are addressed in this letter. The remaining issues are being addressed by the Reference (3) response which will be provided under separate submittal at a later date.

If there are any questions concerning this matter, please contact this office.

Sincerely,



Peter L. Piet
Nuclear Licensing Administrator

Attachment

cc: A.B. Davis, Regional Administrator - RIII
J.F. Stang, Project Manager - NRR
M.N. Leach, Senior Resident Inspector - Dresden
Office of Nuclear Facility Safety - IDNS

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ATTACHMENT 1

The following table gives a listing of the seven issues from the Reference 1 SER which require a response. The items from the Third Ten Year Interval Plan which have replaced those seven issues are listed in the Reference 3 SER Issues column along with a brief status. A short description of each Reference 1 SER issue is included in the Subject column.

REFERENCE 1 SER ISSUES	REFERENCE 3 SER ISSUES	SUBJECT
PR-7	RP-23A Interim relief has been granted for one year. Expires 12/17/93.	Justify the operability of the HPCI pumps with the current vibration readings and provide a detailed basis for the proposed absolute limits, including historical data, manufacturer's review of data, and industry experience.
VR-9	RV-03A Not evaluated by 3rd Ten Year Interval. Not ASME Code Class.	Clarification is needed to address valve redundancy that is present in the system and that by monitoring only the scram air header pressure, individual valve performance cannot be evaluated. In addition, verify that each VR-9 valve is tested to the extent practical.
VR-13	RV-14B Provisional relief granted.	Clarification that both valves 2(3)-1402-34A & 34B will be repaired or replaced if excessive leakage is identified. In addition, remove the disassembly and inspection provision from VR-13 and perform this only as a maintenance activity with the applicable post-maintenance testing.
VR-14	RV-15B Provisional relief granted.	Clarification that both valves 2(3)-1501-67A & 67B will be repaired or replaced if excessive leakage is identified. In addition, remove the disassembly and inspection provision from VR-14 and perform this only as a maintenance activity with the applicable post-maintenance testing.

REFERENCE 1 SER ISSUES	REFERENCE 3 SER ISSUES	SUBJECT
VR-18	RV-23C Provisional relief granted.	Clarification that both valves 2(3)-2345-500 & 501 will be repaired or replaced if excessive leakage is identified. In addition, remove the disassembly and inspection provision from VR-18 and perform this only as a maintenance activity with the applicable post-maintenance testing.
VR-19	RV-23D Provisional relief granted.	Identify which alternative testing method is to be included in the IST Program. Additionally, reference the appropriate section of the IST Program submittal discussed in the alternative testing of relief request VR-19; if applicable
DAIM V-2 (1)	TV-00B Not addressed by this SER.	Certain aspects of information appear to conflict with the response to GL 87-06. Review the testing of these valves and determine if revisions to the IST Program are necessary.

(1) Although DAIM V-2 has been replaced in the Third Ten Year Interval by TV-00B, the SER to the Third Ten Year Interval did not address the concern listed above.

DAIM V-2 was missing valves 2(3)-1402-9A & 9B & 2(3)-0202-44 & 45 which Dresden Station committed to testing as pressure isolation valves (PIV). A review of the IST Plan revealed that these valves are tested as PIVs; thus, the commitment to GL 87-06 by Dresden Station is being met. In addition, the Third Ten Year Interval has included valves 2(3)-1402-9A & 9B in TV-00B. Since the IST Plan does meet the commitment to GL 87-06, no immediate corrective action is necessary. Valves 2(3)-0202-44 & 45 will be added to TV-00B during the next revision of the Plan, which will be submitted in response to the Reference 3 SER.