



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

March 18, 1993

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 Unit 3  
Letter of Intent on Appendix J Exemption for Dresden Unit 3  
NRC Docket No. 50-249

Dr. Murley:

Dresden Station will be seeking a one-time schedular exemption from the 24-month Type B and C local leak rate test intervals required by 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3.

The refuel outage (D3R13) for Dresden Station has been rescheduled from September, 1993 to February, 1994. An increase in the duration between refuel outages causes the station to exceed the 24 month Type B and C surveillance interval. Therefore, an extension (approximately 150 days) to the 24 month interval will be requested for the tests that cannot be performed during operations or during cold shutdown.

Dresden Station is performing Type B and C testing during the Dresden Unit 3 turbine forced outage on volumes that require the unit to be in cold shutdown for testing, as resources permit. By performing the tests during the turbine outage, the total number of volumes requiring an exemption will be reduced. In addition, an administrative limit of 85% of the Technical Specification limit of 0.6 L, has been imposed to assure that the Specification leak rate limit is not exceeded. If upon completion of the Unit 3 forced outage, any volumes remain to be tested, besides those which require a refuel outage, the volumes will be tested during any subsequent cold shutdowns longer than 96 hours.

The exemption request presented by Commonwealth Edison will not cause

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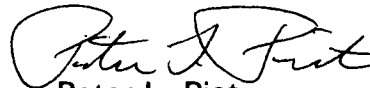
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undue risk to the public, will commit to a good faith effort to complete possible leak rate tests, will provide only temporary relief from the regulations, and will help Commonwealth Edison to avoid undue hardship or costs due to radiological exposure and Unit thermal cycling.

The Dresden Unit 3 turbine forced outage is scheduled to be complete in May, 1993. A request for an extension to the Appendix J testing for the remaining volumes will be submitted for approval after Unit 3 startup.

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

Sincerely,



Peter L. Piet

Nuclear Licensing Administrator

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