



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 30, 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
Request for Scheduling Exemption
From 10 CFR 50, Appendix J,
Type A, B, and C Test Interval
NRC Docket No. 50-249

References: (a) P. Piet letter to T.E. Murley, dated March 18, 1993
(b) P. Piet letter to T.E. Murley, dated May 14, 1993

Dear Dr. Murley:

As a result of Commonwealth Edison anticipating the rescheduling of the upcoming Dresden Unit 3 Refuel Outage (D3R13) from September, 1993 to February, 1994, a request for a one time scheduling exemption from the 10 CFR 50, Appendix J 24 month Type B and C leak rate testing surveillance interval was submitted to your office on May 14, 1993. This exemption requested an increase in the surveillance interval for primary containment pathways which could not be tested during plant operations in order to support the current refueling outage schedule and to avoid the potential for an earlier reactor shutdown.

A subsequent review of the Dresden Unit 3 Type A integrated leak rate test (ILRT) data identified that if the Dresden D3R13 Refuel Outage was extended beyond September, 1993 an extension of the surveillance interval for Type A testing, as defined in 10 CFR 50, Appendix J would also be required. This extension is needed since Dresden Unit 3 failed to meet the acceptance criteria stated in Section III.A.5(b)(2) of 10 CFR 50, Appendix J during its last two integrated leak rate tests. Therefore, as a result of failing two consecutive periodic Type A tests, Section III.A.6(b) of 10 CFR 50, Appendix J specifies "Additional Requirements" which require a Type A test to be performed at each plant shutdown for refueling or approximately every 18 months whichever occurs first.

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Therefore, pursuant to 10 CFR 50.12(a), Commonwealth Edison additionally requests a one time schedular exemption from the "Additional Requirements" for the Type A testing interval identified in Section III.A.6(b) of 10 CFR 50, Appendix J. This exemption would provide for extending the approximate 18 month accelerated Type A test interval to 24 months and was inadvertently omitted from the previously submitted exemption request for Type B and C leak testing. Just as for the Type B and C testing exemption, if a separate forced outage was imposed to perform Type A testing and operation resumed until the next scheduled refuel outage, Commonwealth Edison would be subject to "undue hardships or other costs" that result from increased radiological exposure and unit thermal cycling. The exemption would provide only temporary relief from the applicable regulation and would not extend beyond the normal test interval required for containments not being on the accelerated test schedule.

We regret any inconvenience this supplemental request may cause you or your staff and appreciate your attention to this matter. Please direct any questions you may have regarding this matter to this office.

Very truly yours,



Peter L. Piet
Nuclear Licensing Administrator

cc: J.B. Martin, Regional Administrator - RIII
J.F. Stang, Project Manager - NRR
M.N. Leach, Senior Resident Inspector - Dresden