



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 Units 2 and 3
Transmittal of Response to the 3rd Ten Year
Interval Inservice Testing (IST) Plan
Safety Evaluation and Revision 1
NRC Docket Nos. 50-237 and 50-249

References: (a) P. Piet letter to T. Murley, dated March 17, 1993.
(b) J. Dyer letter to T. Kovach, dated December 17, 1992.
(c) R. Barrett letter to T. Kovach, dated September 11,
1992.

Dear Dr. Murley:

As discussed in Reference (a), this letter provides transmittal of Commonwealth Edison's (CECo) response to the Reference (b) Safety Evaluation Report (SER) and associated changes. In addition, five attachments have been included with this transmittal. Attachment 1 provides a summary of changes directly related to the SER. Attachment 2 provides a summary of changes made independent of the SER. Attachment 3 is a complete copy of Revision 1 to the 3rd Ten Year IST Plan. Attachment 4 provides specific methodology used in program development. Attachment 5 provides a brief explanation of differences between Revision 0 and Revision 1 to the IST Plan.

Relief Request RV-23H has been modified indicating that the HPCI Exhaust Drain Pot Solenoid valves are stroked without timing on an operational basis. This Relief Request will be re-submitted prior to September 11, 1993 (as requested in Reference (c)) when testing methods such as acoustics or impedance measurements can be satisfactorily used to monitor valve degradation.

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Dr. Murley

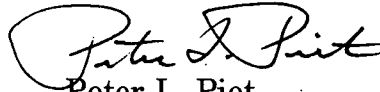
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Dresden Station is also investigating the removal of the internals for check valves 2-5202B-501, 3-5202B-501, and 2/3-5202B-501. When this investigation is complete, these valves will be removed from the IST Plan and the change submitted to the NRC Staff for your approval.

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

Sincerely,



Peter L. Piet

Nuclear Licensing Administrator

Attachments:

- 1) Summary of Changes in Response to Safety Evaluation
- 2) Summary of Changes Independent of Safety Evaluation
- 3) Dresden Station Third Ten Year Inservice Testing Plan, Revision 1
- 4) Process Used to Develop Dresden's IST Plan
- 5) Differences Between Revision 0 and Revision 1 to the IST Plan

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

ATTACHMENT 1
SUMMARY OF CHANGES
IN RESPONSE TO SAFETY EVALUATION
FOR DOCKET NUMBERS 50-237 AND 50-249

<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>	<u>COMMENTS</u>
Table of Contents	1-1	The Table of Contents was revised to reflect new page numbers in revised sections.	
Revision Summary Sheet	2-1	The Revision Summary Sheet was revised to reflect current status of revised sections.	
Plan Intro. Section 2.1	3-2	Added use of ANSI/ASME OMa-1988 PART 6 for Vibration Requirements.	
Class 1, 2, and 3 Pump Listing	5-1 to 5-8	Deleted RP-00A from all pumps.	See updated Relief Requests.
		Added RP-11B to both SBLC pump listings.	
		Added the ECCS Keep fill pumps.	
Augmented Pump Listing	6-1 to 6-2	Deleted RP-00A from all pumps.	See updated Relief Requests.
Pump Relief Request Index	7-1	The index was updated to reflect:	
		1) New revision status of Relief Requests RP-11A, RP-23A, and RP-52A.	
		2) Deletion of Relief Request RP-00A.	
		3) Addition of Relief Requests RP-11B and RP-14A.	
Relief Request RP-00A	8-1	Deleted this Relief Request.	Relief is not required because of compliance with ANSI/ASME OMa-1988 Part 6 Vibration monitoring Requirements.
Relief Request RP-11B	8-5	Added this Relief Request.	Includes portion of Relief Request RP-00A, Revision 0, that was SBLC pump specific.
Relief Request RP-14A	8-6	Added this Relief Request.	
Relief Request RP-23A	8-9 to 8-11	Additional information is provided in justification.	

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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>	<u>COMMENTS</u>
Valve Relief Request Index	13-1	The index was updated to reflect: 1) New revision status of Relief Requests RV-00C, RV-02A, RV-02D, RV-02E, RV-03A, RV-03C, RV-13A, RV-14B, RV-15B, RV-23A, RV-23C, RV-23D, RV-23E, RV-23H, RV-24A, RV-25A, and RV-57A. 2) Deletion of Relief Requests RV-02B. 3) Addition of Relief Request RV-52A.	
Relief Request RV-00C	14-3	Removed reference to valves 2(3)-2301-7.	Valves were duplicated in Relief Request RV-23B.
Relief Request RV-02A	14-4 to 14-5	Included inspection for abnormal degradation while valve removed for rebuilding.	
Relief Request RV-02B	14-6	Deleted.	Relief Request is no longer needed due to compliance with OM-1.
Relief Request RV-14B	14-24	Modified to indicate that the valves are tested and repaired or replaced as a series vice disassembly and inspection.	
Relief Request RV-15B	14-27	Modified to indicate that the valves are tested and repaired or replaced as a series vice disassembly and inspection.	
Relief Request RV-23C	14-32	Modified to indicate that the valves are tested when on service, and repaired or replaced as a series vice disassembly and inspection.	
Relief Request RV-23D	14-33 to 14-34	Modified to indicate that the valves are tested and repaired or replaced as a series vice disassembly and inspection.	
Relief Request RV-23E	14-35 to 14-36	Additional information is provided in justification.	
Relief Request RV-23H	14-40	Modified to indicate stroking on a quarterly basis without timing. Other testing methodology to be examined.	

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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>	<u>COMMENTS</u>
Relief Request RV-25A	14-42 to 14-43	Additional information is provided in justification.	
Relief Request RV-57A	14-46	Modified alternate test to include examination for degradation.	
Valve Technical Approach and Position Index	15-1	The index was updated to reflect: 1) New revision status of Technical Approach and Positions TV-00B and TV-00C. 2) Addition of Technical Approach and Position TV-00F.	
Technical Approach and Position TV-00B	16-3 to 16-4	Added 2(3)-0220-44 and 2(3)-0220-45 to this Technical Approach and Position	Correction carried over from Revision 4 of the 2nd Ten Year IST Plan.
Technical Approach and Position TV-00C	16-5 to 16-7	Removed reference to the following valves: 1) HPCI Turbine exhaust vacuum breakers. 2) Core Spray keep fill check valves. 3) LPCI keep fill check valves. 4) HPCI keep fill check valves.	See Relief Requests RV-14B, RV-15B, RV-23C and RV-23D.
Class 1, 2 and 3 Valve Listing	11-1 to 11-122	Removed reference to Technical Approach and Position TV-00C, added a stroke open test (CT-O), and changed test frequency to operational (OP) for 3-1499-34A, 2-1402-34A, 2(3)-1402-34B, 2(3)-1402-36A(B), 2(3)-1501-66A(B), 2(3)-1501-67A(B), 2(3)-2354-500, 2(3)-2354-501. Removed reference to Technical Approach and Position TV-00C, and changed the test frequency to a refueling outage (RR) basis for 2(3)-2399-76A(B) and 2(3)-2399-77A(B) Added reference to Technical Approach and Position TV-00B for 2(3)-0220-44 and 2(3)-0220-45. Removed reference to Relief Request RV-02B for 2(3)-0203-3A(B,C,D,E).	See Relief Requests RV-14B, RV-15B and RV-23C.

ATTACHMENT 2
SUMMARY OF CHANGES
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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>
Relief Request RP-11A	8-3 to 8-4	Code Requirements corrected to indicate that requirements come from Table IWP-3100-1.
Relief Request RP-19A	8-7 to 8-8	Removed reference to Relief Request RP-00A.
Relief Request RP-52A	8-11	Added differential pressure and flow rate to request The Basis For Relief was modified to support these additions.
Pump Technical Approach and Position Index	9-1	The Pump Technical Approach and Position Index was revised to reflect the current status of revised Technical Approach and Positions.
Technical Approach and Position TP-00A	10-1	Clarify which pumps have independent lubricating systems. The Fuel Pool Cooling pumps and the Diesel Fuel Oil Transfer Pumps have been removed from this Technical Approach and Position.
Relief Request RV-02D	14-8 to 14-9	The stroke open test was removed from the alternate test section. The check valves have no open stroke safety function, and the test was inadvertently included.
Relief Request RV-02E	14-10 to 14-11	Added vacuum breakers 2(3)-0299-068A(B,C,D,E) which were inadvertently left off.
Relief Request RV-03A	14-13 to 14-14	Added check valve 2(3)-0301-122.
Relief Request RV-03C	14-17 to 14-18	Added check valve 2(3)-0399-525.
Relief Request RV-13A	14-21	Deleted reference to valves 2(3)-1301-36 and 2(3)-4107-501.
Relief Request RV-14B	14-24	Changed valve number 3-1402-34A to 3-1499-34A. Valves 2(3)-1402-36A and 2(3)-1402-36B have been added.
Relief Request RV-15B	14-27	Valves 2(3)-1501-66A and 2(3)-1501-66B have been added.
Relief Request RV-23A	14-28 to 14-29	Added Relief from partial stroke exercise and removed partial stroke from alternate test.
Relief Request RV-23C	14-32	Valves 2(3)-2354-501 have been added.

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Relief Request RV-23D	14-33 to 14-34	Changed 2(3)-2399-76A and 2(3)-2399-76B to Class 2.																				
Relief Request RV-24A	14-41	Withdraw request for open stroke test of valves 2(3)-2499-28A and 2(3)-2499-28B																				
Relief Request RV-52A	14-45	Added this Relief Request for valve 3-5202C-500. This valve is non-Code Class.																				
Technical Approach and Position TV-00C	16-5 to 16-7	Changed classification of valve 2(3)-1301-11 to SR. Deleted valves 2(3)-1301-10 and 2(3)-4107-501.																				
Technical Approach and Position TV-00F	16-10 to 16-11	This Technical Approach and Position was added to explain leakage testing of non-category A valves for other than IST purposes.																				
Cold Shutdown Justification Index	17-1	The Cold Shutdown Justification Index was revised to reflect the current status of the Cold Shutdown Justifications.																				
Class 1, 2 and 3 Valve Listing	11-1 to 11-122	<p>Valves 2(3)-1301-36 and 2(3)-4107-501 are no longer Safety Related and have been removed from the plan.</p> <p>Valves 2(3)-1301-10 have been changed from Class 3 to Safety Related, and have been moved to the Augmented valve listing.</p> <p>Added reference to Technical Approach and Position TV-00C to the valve table listing for valve 2-1301-11.</p> <p>Corrected the valve listing for valves 2(3)-2499-1A, 2(3)-2499-1B, 2(3)-2499-2A, and 2(3)-2499-2B to show their normal position as open.</p> <p>The category for the following valves has been changed from Category A to Category B valves. In addition, reference to RV-00A has been removed and reference to TV-00F has been added:</p> <table style="margin-left: 40px;"> <tr><td>3-0302-156A</td><td>2(3)-1402-3A</td></tr> <tr><td>3-0302-156B</td><td>2(3)-1402-3B</td></tr> <tr><td>2(3)-0302-157A</td><td>2(3)-1501-5A</td></tr> <tr><td>2(3)-0302-157B</td><td>2(3)-1501-5B</td></tr> <tr><td>2-0302-158A</td><td>2(3)-1501-5C</td></tr> <tr><td>2-0302-158B</td><td>2(3)-1501-5D</td></tr> <tr><td>2(3)-0302-160A</td><td>2(3)-2301-35</td></tr> <tr><td>2(3)-0302-160B</td><td>2(3)-2301-36</td></tr> <tr><td>2(3)-0302-161A</td><td></td></tr> <tr><td>2(3)-0302-161B</td><td></td></tr> </table> <p>Corrected listing for valves 2(3)-2599-22 to remove the reference to CS-47A and stroke close test (CT-C).</p>	3-0302-156A	2(3)-1402-3A	3-0302-156B	2(3)-1402-3B	2(3)-0302-157A	2(3)-1501-5A	2(3)-0302-157B	2(3)-1501-5B	2-0302-158A	2(3)-1501-5C	2-0302-158B	2(3)-1501-5D	2(3)-0302-160A	2(3)-2301-35	2(3)-0302-160B	2(3)-2301-36	2(3)-0302-161A		2(3)-0302-161B	
3-0302-156A	2(3)-1402-3A																					
3-0302-156B	2(3)-1402-3B																					
2(3)-0302-157A	2(3)-1501-5A																					
2(3)-0302-157B	2(3)-1501-5B																					
2-0302-158A	2(3)-1501-5C																					
2-0302-158B	2(3)-1501-5D																					
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2(3)-0302-161B																						

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Class 1, 2 and 3 Valve Listing (Cont.)	11-1 to 11-122	Changed number for valve 3-1402-34A to 3-1499-34A.
		Changed number for valve 2/3-3999-200 to 2/3-1599-103.
		Valves 2(3)-2399-76A and 2(3)-2399-76B have been changed from Safety Related to Class 2. These valves have been moved from the Augmented valve listing to the Class 1, 2, and 3 valve listing.
		Corrected stroke test abbreviation for valve 2-1001-2A to BT.
		Removed requirement for seat leakage test (AT) and reference to Relief Request RV-00A for valves 2(3)-1402-4A(B), 2(3)-1501-20A(B), and 2(3)-1501-38A(B).
		Deleted reference to Relief Request RV-00A for valves 2(3)-1402-9A and 2(3)-1402-9B.
		Added stroke closed test (CT-C) for valves 2(3)-1501-1A, 2(3)-1501-1B, 2(3)-1501-1C, and 2(3)-1501-1D.
		Added reference to Technical Approach and Position TV-00C for valve 2-2301-39.
		Removed reference to Technical Approach and Position TV-00C for valve 2-2301-4.
		Removed reference to Relief Request RV-00D for valves 2(3)-2301-7.
		Changed stroke direction for valves 2(3)-2499-28A(B) to open and closed (O/C).
		Added reference to Relief Request RV-02E for valves 2(3)-0299-068A, 2(3)-0299-068B, 2(3)-0299-068C, 2(3)-0299-068D, and 2(3)-0299-068E.
		Valves 2(3)-1501-3A and 2(3)-1501-3B were added to the plan.
		The listings for valves 2(3)-2599-26A and 2(3)-2599-26B have been corrected to show these valves as passive. Reference to Relief Request RV-00B has been deleted.
		Valve 2/3-3999-336 has been changed to passive.
	Changed Relief Request reference for valves 2(3)-0220-59 and 2-1201-158 from RV-00D to RV-00C.	

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Augmented Valve Listing	12-1 to 12-71	<p>Added valves 2(3)-0301-122 to the Augmented Valve Listing.</p> <p>Added valves 2-4699-316, 2/3-4699-316, and 3-4699-316 to the plan.</p> <p>Changed valve numbers 2(3)-2541-01 to 2(3)-2599-79</p> <p>The category for valves 2(3)-1599-61 and 2(3)-1599-62 has been changed from Category A to Category B. In addition, reference to RV-00A has been removed and reference to TV-00F has been added:</p> <p>Changed numbers for valves 2(3)-0302-166A and 2(3)-0302-166B to 2(3)-0301-166A and 2(3)-0301-166B respectively.</p> <p>Valves 2-1699-85A, 3-1699-85, 2(3)-1699-96, 2(3)-4102, 2(3)-4399-73, 2(3)-4399-74, 3-5202C-501, and 3-5202C-502 were removed from the plan.</p> <p>Removed the requirement to perform a seat leakage test (AT) and removed the reference to Relief Request RV-00A for valves 2(3)-4799-511.</p> <p>Added the reference to Relief Request RV-52A for valve 3-5202C-500.</p> <p>The stroke close test (CT-C) for the Back Draft Dampers has been deleted.</p>

ATTACHMENT 4

Process Used to Develop Dresden's IST Plan

This attachment is provided in response to the NRC's Request for Additional Information 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&IDs)
 - d. Master Equipment List (MEL)
 - e. Generic Letter 89-04
 - f. SERs 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 for 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 review and signs all modifications and minor modifications. This is coordinated by Dresden Administrative Procedure (DAP) 5-1, Plant Modification Program.