

Docket File



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 1, 1994

Docket Nos. 50-237
and 50-249

Mr. D. L. Farrar, Manager
Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III, Suite 500
1400 OPUS Place
Downers Grove, Illinois 60515

Dear Mr. Farrar:

SUBJECT: REACTOR WATER CLEANUP SYSTEM PIPING INSPECTION PROGRAM, DRESDEN
NUCLEAR POWER STATION, UNITS 2 AND 3 (TAC NOS. M88700 AND M88701)

By letter dated December 23, 1992, the NRC accepted your proposed inspection and action plan concerning the Reactor Water Cleanup (RWCU) system as stated in your letter dated December 14, 1992. In our December 23, 1992 letter, we requested that Commonwealth Edison Company (CECo) notify the NRC should any cracking be identified during the RWCU system piping inspections regardless of whether or not repairs were required. By letter dated August 20, 1993, CECo provided the results of the inspection of the RWCU system piping for Dresden Unit 2, which were completed during the refueling outage in the spring of 1993. Seven of the eight welds inspected showed indications of Inter Granular Stress Corrosion Cracking (IGSCC). Each of the welds showing IGSCC indications were repaired.

Based on the inspection findings, CECo made the decision that continued inspections would not be beneficial. Your August 20, 1993, letter proposed a new plan for the RWCU system piping to ensure compliance with the requirements of Generic Letter (GL) 88-01. CECo proposes to discontinue any further inspections of the existing RWCU piping. In lieu of the continued inspections, CECo proposes to replace all the RWCU piping, RWCU pumps and the regenerative heat exchangers at Dresden, Units 2 and 3. The design and modification and piping replacement of the RWCU system will be performed within the bounds of 10 CFR 50.59. We request all information concerning the 50.59 be maintained at the station for future inspections.

The proposed schedule for the piping replacement of the RWCU system piping is as follows:

Dresden Unit 2

D2R14 - November 1994
D2R15 - August 1996

Dresden Unit 3

D3R14 - November 1995
D3R15 - August 1997

Two outages are required for the replacement based on long lead procurement times of items involved with the RWCU system modifications. Dresden Unit 3 is scheduled for a refueling outage to begin in March 1994. Again, it's not

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possible to begin replacement activities during the D3R13 outage due to the long lead time required for the major planning involved with the RWCU system piping replacement. Work packages are currently being developed for the RWCU piping replacement and equipment and material procurement.

Upgrades and enhancements to the RWCU isolation valves to meet the provisions of GL 89-10, Supplement 3 have been completed on Unit 2 and will be completed on Unit 3 in the upcoming refueling outage in March 1994. These modifications will greatly improve the isolation compatibility of the RWCU system. Temperature and radiation monitors, which alarm in the control room, are installed in all areas where existing RWCU piping is routed. If a leak should occur in the RWCU piping prior to the scheduled piping replacement, the temperature and radiation monitors would detect small leaks, allowing operator action to isolate the RWCU piping, long before pipe cracks would propagate to a critical crack size.

Based on the above, the NRC staff finds that the new proposed RWCU pipe replacement is acceptable and the current inspection program may be discontinued, based on CECO's commitment to fully replace the RWCU piping and upgrade the RWCU system motor operated valves to improve system isolation capability. Acceptance of the proposed change to eliminate the inspection program was based heavily on the proposed RWCU piping replacement schedule. Within 60 days of receipt of this letter, please provide the NRC with a proposed mechanism (i.e., license condition, Final Safety Analysis Report commitment) which will assure the NRC that the proposed above piping replacement schedule will be met without further delay. In addition, the discontinuation of the RWCU inspections will save 120 man rem in exposure during the upcoming refueling outages.

Sincerely,

Original signed by:

John F. Stang, Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

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COPY	(YES) NO	(YES) NO	(YES) NO	YES/NO	YES/NO	YES/NO

Mr. D. L. Farrar
Commonwealth Edison Company

Dresden Nuclear Power Station
Unit Nos. 2 and 3

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