



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 29, 1994

Mr. William T. Russell, 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
Reactor Water Clean-Up (RWCU) Outboard Piping
Replacement Scheduler Commitment
NRC Docket Nos. 50-237/249

Reference: (a) P. Piet letter to T. Murley, dated
August 20, 1993

(b) J. Stang letter to D. Farrar, dated
March 1, 1994

Mr. Russell:

In Reference (a), Commonwealth Edison Company (CECo) submitted a revised inspection plan for the Dresden Unit 2 and Unit 3 outboard RWCU piping which committed to performing a replacement of all IGSCC susceptible outboard supply and return piping, eliminating the requirement for further inspections. In Reference (b), this change was accepted by the NRC staff. However, the NRC staff emphasized the importance of the proposed replacement schedule in their acceptance of this revision and requested that CECO provide the mechanism which will be used to ensure adherence to the schedule.

In response to this request, Dresden Station will revise the Updated Final Safety Analysis Report (UFSAR) to reflect the scheduler commitment stated in Reference (a) which obligates the station to performing the Unit 2 replacement during the D2R14 and D2R15 outages and the Unit 3 replacement during the D3R14 and D3R15 outages.

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Mr. Russell

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This schedular commitment will appear in section 5.2.3.5.1 of the UFSAR, Program to Mitigate Intergranular Stress Corrosion Cracking. The addition of this commitment to the UFSAR will be initiated so that the commitment will appear in the next scheduled revision of the UFSAR which will be published in December of 1995. Commonwealth Edison Company understands that the replacement of the RWCU outboard piping will satisfy all requirements of Generic Letter 88-01 (including Supplement 1) and as such, no further inspection of the outboard RWCU piping will be required.

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

Sincerely,



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
Office of Nuclear Facility Safety - IDNS