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Downers Grove, Illinois 60515

January 17, 1995

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to the NRC Staff's Safety Evaluation regarding the Dresden
Station Third Ten-Year Interval Inservice Inspection (ISI) Plan, Revision 2
NRC Docket Nos. 50-237 and 50-249

- References: (a) J. Stang (NRR) letter to D. Farrar (ComEd), dated June 23, 1994.
(b) P. Piet (ComEd) letter to T. Murley (NRR), dated August 13, 1993.
(c) J. Stang (NRR) letter to D. Farrar (ComEd), dated May 19, 1994.

In Reference (b) Commonwealth Edison (ComEd) submitted Revision 2 of the Dresden Third Ten-Year Interval Inservice Inspection (ISI) Plan as well as a response to the Reference (a) Request for Additional Information to the NRC staff. In Reference (c), the NRC staff provided ComEd with a Safety Evaluation of the Reference (b) document.

The Reference (c) Safety Evaluation stated that "The Dresden Nuclear Power Station Units 2 and 3, third ten-year interval program plan, Revision 2, is in compliance with the Code, except the portions of the main steam system piping from the outboard isolation valves and the residual heat removal piping that feeds the reactor pressure vessel (RPV) head spray (Drawing ISI-127). The licensee has identified these portions of the systems as non-classed therefore, the two systems do not meet the intent of Regulatory Guide 1.26, Quality Group Classification and Standards for Water-, Steam-, and Radioactive-Waste-Containing Components of Nuclear Power Plants. The licensee needs to address this issue either by implementing examination sample size and weld selection of the above systems or by submitting to the NRC its bases for omitting these systems."

The purpose of this letter is to provide the NRC staff ComEd's basis for omitting these systems from the Dresden Nuclear Power Station Units 2 and 3, Third Ten-Year Interval Inservice Inspection Plan, Revision 2.

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"Residual Heat Removal piping that feeds the reactor pressure vessel (RPV) head spray (Drawing ISI-127)"

The reactor vessel head spray system collapses the steam bubble during vessel flooding, cools the reactor vessel head and condenses the steam in the vessel while the reactor is in the shutdown mode of operation. The head spray system is not fed by residual heat removal piping, but rather by one or more control rod drive (CRD) pumps which deliver condensate to the area inside the vessel head through the head cooling spray nozzle.

The only safety function of the reactor vessel head spray system is that of maintaining primary coolant pressure boundary integrity. In order to achieve this function the head spray system piping and pressure retaining components are classified as safety-related, ASME Section XI Class 1 from the reactor vessel head to the second isolation valve per 10CFR50.55a. Because the second isolation valve marks the end of the primary coolant pressure boundary, and the only safety-related function of this system is to maintain primary coolant pressure boundary integrity, the reactor vessel head spray system piping and components beyond the second isolation valve are classified as non-safety-related.

In classifying the head spray system into quality groups per Regulatory Guide 1.26, Section B of the guide requires Group A (e.g., Class 1) quality standards to be applied to the primary coolant pressure boundary per 10CFR50.55a. Section B goes on to state that "This guide describes a method for determining acceptable quality standards for the remaining safety-related components containing radioactive material, water, or steam, i.e., quality Group B, C, and D components."

Because the reactor vessel head spray piping and components beyond the second isolation valve have been classified as non-safety-related at Dresden Station, the provisions of Regulatory Guide 1.26 do not apply to this piping. As such, the piping is not classified for ISI purposes and Section XI examination and testing is not required.

"Main steam system piping from the outboard isolation valves"

The main steam piping supplies steam to the turbine-generator from the reactor vessel. In addition to supplying steam to drive the main turbine, the main steam system also supplies steam to the turbine gland seal system, steam jet air-ejectors, off-gas preheater and booster air-ejectors, main condenser low-load reheat coils, and liquid radwaste boiler.

The only safety function of the main steam system is that of maintaining primary coolant pressure boundary integrity. In order to achieve this function the main steam system piping and pressure retaining components are classified as safety-related, ASME Section XI Class 1 from the reactor pressure vessel to the second isolation valve per 10CFR50.55a. Because the second isolation valve marks the end of the primary coolant pressure boundary, and the only

safety-related function of this system is to maintain primary coolant pressure boundary integrity, the main steam system piping and components beyond the second isolation valve are classified as non-safety-related.

In classifying the main steam system into quality groups per Regulatory Guide 1.26, Section B of the guide requires Group A (e.g., Class 1) quality standards to be applied to the primary coolant pressure boundary per 10CFR50.55a. Section B goes on to state that "This guide describes a method for determining acceptable quality standards for the remaining safety-related components containing radioactive material, water, or steam, i.e., quality Group B, C, and D components."

Because the main steam system piping and components beyond the second isolation valve have been classified as non-safety-related at Dresden Station, the provisions of Regulatory Guide 1.26 do not apply to this piping. As such, the piping is not classified for ISI purposes and Section XI examination and testing is not required.

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

Respectfully,



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