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Dresden Generating Station  
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Tel 815-942-2920



August 31, 1995

TPJ Ltr. #95-102

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D. C. 20555

Subject: Dresden Nuclear Power Station Units 2 and 3 Third Ten-Year Interval Inservice Testing (IST) Plan, Revision 3. NRC Docket Nos. 50-237 and 50-249

- References:
- (a) T. Joyce letter to USNRC, dated July 14, 1995, Dresden Nuclear Power Station Units 2 and 3 Third Ten-Year Interval Inservice Testing Plan.
  - (b) P. Piet letter to T. Murley, dated June 30, 1993, Transmittal of Revision 1 to the Dresden IST Plan.
  - (c) P. Piet letter to T. Murley, dated September 10, 1993, Transmittal of Revision 2 to the Dresden IST Plan.
  - (d) R. Barrett letter to T. Kovach, dated September 11, 1992, NRC staff Safety Evaluation of Revision 0 to the Dresden IST Plan.
  - (e) J. Dyer letter to T. Kovach, dated December 17, 1992, NRC staff Safety Evaluation of Revision 0 to the Dresden IST Plan.

The purpose of this letter is to submit Revision 3 to the Dresden Station Third Ten Year Interval Inservice Testing Plan. As stated in Reference (a), Revision 3 supersedes Revisions 1 and 2 (References (b) and (c)) in their entirety. Therefore, Revision 3 addresses all concerns raised in References (d) and (e).

Dresden Station has recently performed a self assessment of the IST Program. As a result of this assessment, Dresden has decided to update the IST Program. Revision 3 to the IST Plan includes updating the pump testing to meet the requirements of ASME/ANSI OM (Part 6) in its entirety and updating the Relief Requests contained in References (b) and (c) to the current IST Program and NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants".

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In order to expedite Dresden's planning and implementation of Revision 3 of the IST Plan, ComEd requests NRC staff review and approval of Revision 3 of the IST Plan, in its entirety, within 90 days of receipt by the NRC staff.

Attachment 1 provides a summary of changes directly related to the Safety Evaluations, References (d) and (e). Attachment 2 provides a summary of changes made independent of those Safety Evaluations. Attachment 3 is a complete copy of Revision 3 to the 3rd Ten Year IST Plan. Attachment 4 describes the process used to develop Dresden's IST Plan.

If there are any questions concerning this letter please refer them to Peter Holland, Dresden Station Regulatory Assurance Supervisor, at (815) 942-2920, extension 2714.

Sincerely,



Thomas P. Joyce  
Site Vice President  
Dresden Station

TPJ/cls

**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 3
- 4) Process Used to Develop Dresden's IST Plan

cc: H. J. Miller, Regional Administrator - RIII  
J. F. Stang, Project Manager - NRR  
M. N. Leach, Senior Resident Inspector - Dresden  
Office of Nuclear Facility Safety - IDNS

50-237

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SUMMARY OF CHANGES IN RESPONSE TO SAFETY  
EVALUATION OF THE THIRD TEN-YEAR INTERVAL  
INSERVICE TESTING PLAN REV. 3

REC'D W/LTR DTD 8/31/95...9509060187

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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>
Class 1, 2, and 3 Pump Listing	5-1 to 5-7	Added the ECCS Keep fill pumps.  Removed reference to Relief Request RV-23A from the HPCI pump listings.	Relief Request has been deleted.
Pump Relief Request Index	7-1	The index was updated to reflect:  1. Deletion of RP-00A  2. Deletion of RP-23A.  3. Addition of Relief Requests RP-11B and RP-14A.	
Relief Request RP-00A	NA	This Relief Request is no longer necessary and has been deleted	The IST Program has committed to ANSI/ASME OMa-1988 Part 6 in its entirety.
Relief Request RP-11B	8-1 to 8-2	Added this Relief to support SBLC pumps following deletion of RP-00A.	Additional information is provided to correct and address frequency limitations.
Relief Request RP-14A	8-3	Added this Relief to support the addition of the ECCS Keep Fill Pumps to the plan.	
Relief Request RP-23A	NA	This relief request has been deleted.	The baseline vibration levels have been reduced since initial submittal.
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 RV-02B for 2(3)-0203-3A(B,C,D,E).	Changes required to address concerns about RV-14B, RV-15B and RV-23C  Relief Request RV-02B is no longer needed.
Valve Relief Request Index	13-1 to 13-4	The index was updated to reflect:  1. New revisions to RV-00C, RV-02A, RV-14B, RV-15B, RV-23C, RV-23D, RV-23E, RV-23H, RV-25A, and RV-57A.  2. Deletion of RV-02B.	
Relief Request RV-00C	14-3	Removed reference to valves 2(3)-2301-7 as recommended in TER Section 3.8.1.1.	No other changes were made to this approved Relief Request.

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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>	<u>COMMENTS</u>
Relief Request RV-02A	14-4 to 14-5	Included inspection for abnormal degradation when rebuilding and timing by indirect methods.	Per guidance of NUREG 1482 Section 4.3.4
Relief Request RV-02B	NA	Deleted as recommended in TER Section 3.2.1.3.2.	Relief Request is no longer needed due to compliance with OM-1.
Relief Request RV-14B	14-21	Modified to indicate that the valves are tested and repaired or replaced as a series vice disassembly and inspection. Removed Reference to Cold shutdown testing.	Per guidance of NUREG 1482 Section 4.1.1.
Relief Request RV-15B	14-25	Modified to indicate that the valves are tested and repaired or replaced as a series vice disassembly and inspection. Removed Reference to Cold shutdown testing.	Per guidance of NUREG 1482 Section 4.1.1.
Relief Request RV-23C	14-30	Modified to indicate that the valves are tested and repaired or replaced as a series vice disassembly and inspection. Removed Reference to Cold shutdown testing.	Per guidance of NUREG 1482 Section 4.1.1.
Relief Request RV-23D	14-31 to 14-32	Modified to indicate that the valves are tested and repaired or replaced as a series vice disassembly and inspection.	
Relief Request RV-23E	14-33 to 14-34	Additional information is provided in justification.	
Relief Request RV-23H	14-38 to 14-39	Modified to indicate stroking on a quarterly basis without timing and valve removal and inspection every third outage.	
Relief Request RV-25A	14-41 to 14-42	Additional information is provided in justification.	Uses guidance of NUREG 1482 Section 4.1.4.
Relief Request RV-57A	14-44	Modified alternate test to include examination for degradation.	

ATTACHMENT 2  
SUMMARY OF CHANGES  
INDEPENDENT OF SAFETY EVALUATION  
FOR DOCKET NUMBERS 50-237 AND 50-249

<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</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 1.3.2	3-1	Updated referenced paragraphs for 10CFR50. Added reference to NUREG-1482 for guidance on relief request submittals.
Plan Intro. Section 1.3.3	3-1	Added paragraph to explain that non-Code items will be discussed in Technical Approach & Positions and not in Relief Requests.
Plan Intro. Section 2.1	3-2	Added use of ANSI/ASME OMa-1988, Part 6, for Pump testing and removed use ASME Section XI, Subsection IWP. Added use of OMa-1988, Part 10, Sections 4.2.1.2(g) and 4.3.2.2(g) for cold shutdown valve testing as described in NUREG-1482.
Plan Intro. Section 4.8	3-4	Updated referenced paragraphs of 10CFR50 and added OMa-1988, Part 6.
Plan Intro. Section 4.14	3-5	Updated referenced paragraphs of 10CFR50.
Plan Intro. Section 5.0	3-8	Corrected test type abbreviations to match tests of OMa-1988, Part 6.
Plan Intro. Section 6.0	3-9	Corrected Test Schedule abbreviations to include a 10Y interval.
List of IST P&IDs	4-1 to 4-2	Added M-26 SH 3, and M-357 SH 3.
Class 1, 2, and 3 Pump Listing	5-1 to 5-7	The following changes were made to the pump listing as a result of converting the pump testing portion of the IST Plan to ANSI/ASME OMa-1988, Part 6 vice ASME Section XI. <ol style="list-style-type: none"> <li>1. Removed reference to Relief Requests RP-00A and RP-00B, and Technical Approach and Positions TP-00A and TP-00B from all pump listings.</li> <li>2. Removed Requirement to measure bearing temperature and lube oil level.</li> <li>3. Changed inlet pressure to discharge pressure.</li> <li>4. Added reference to RP-11B to all SBLC pump listings.</li> <li>5. Removed reference to RP-11A from all SBLC pump listings.</li> </ol>

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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>
Augmented Pump Listing	6-1 to 6-2	The following changes were made to the pump listing as a result of converting the pump testing portion of the IST Plan to ANSI/ASME OMa-1988, Part 6 vice ASME Section XI.  <ol style="list-style-type: none"> <li>1. Removed reference to Relief Requests RP-00A and RP-00B, and Technical Approach and Positions TP-00A and TP-00B from all pump listings.</li> <li>2. Removed Requirement to measure bearing temperature and lube oil level.</li> <li>3. Changed inlet pressure to discharge pressure.</li> </ol> Added the Unit 2 and Unit 3 HPCI Auxilliary Lube Oil Pumps.  Changed RP-19A to TP-19A for the Fuel Pool Cooling Pumps and RP-52A to TP-52A for the Diesel Fuel Oil Transfer Pumps.
Pump Relief Request Index	7-1	The index was updated to reflect:  <ol style="list-style-type: none"> <li>1. The removal of RP-00A, RP-00B, and RP-11A.</li> <li>2. Conversion of RP-19A and RP-52A to TP-19A and TP-52A.</li> </ol>
Relief Request RP-00A	NA	This Relief Request is no longer necessary due to converting the IST plan to an ANSI/ASME OMa-1988 Part 6 basis.
Relief Request RP-00B	NA	This Relief Request is no longer necessary due to converting the IST plan to an ANSI/ASME OMa-1988 Part 6 basis.
Relief Request RP-11A	NA	This Relief Request is no longer necessary due to converting the IST plan to an ANSI/ASME OMa-1988 Part 6 basis.
Relief Request RP-19A	NA	Converted to TP-19A with modified discussion and position.
Relief Request RP-52A	NA	Converted to TP-52A with modified discussion and position.
Pump Technical Approach & Position Index.	9-1	The index was revised to reflect:  <ol style="list-style-type: none"> <li>1. The removal of TP-00A and TP-00B.</li> <li>2. The addition of TP-19A, TP-23A, and TP-52A.</li> </ol>
Technical Approach & Position TP-00A	NA	This Technical Approach and Position is no longer necessary due to converting the IST plan to an ANSI/ASME OMa-1988 Part 6 basis.
Technical Approach & Position TP-00B	NA	This Technical Approach and Position is no longer necessary due to converting the IST plan to an ANSI/ASME OMa-1988 Part 6 basis.

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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>
Technical Approach & Position TP-19A	10-1	Previously RP-19A, with modified discussion and position.
Technical Approach & Position TP-23A	10-2	Added to support testing the HPCI Aux Lube Oil Pump.
Technical Approach & Position TP-52A	10-3	Previously RP-52A with modified discussion and position.
Class 1, 2 and 3 Valve Listing	11-1 to 11-122	<p>Valves 2(3)-1301-36 and 2(3)-4107-501 are not Safety Related and have been removed from the plan.</p> <p>Valves 2(3)-1301-10 and 2(3)-5741-35 are not Class 3 and have been moved to the Augmented valve listing.</p> <p>Added TV-00C to the listing for valve 2-1301-11.</p> <p>Changed the CT-0 frequency for the following valves to SAM, and added reference to TV-00C:</p> <p style="padding-left: 40px;">2(3)-2599-23A      2(3)-2599-23B  2(3)-2599-24A      2(3)-2599-24A</p> <p>The normal position for valves 2(3)-2499-1A, 2(3)-2499-1B, 2(3)-2499-2A, and 2(3)-2499-2B is now shown as open.</p> <p>The category for the following valves has been changed from Category A to Category B valves, and reference to RV-00A has been removed.</p> <p style="padding-left: 40px;">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</p> <p>Removed TV-00C from valve 2-2301-4.</p> <p>Removed RV-00D and added CS-23A to 2(3)-2301-7.</p> <p>Changed stroke direction to O/C for 2(3)-2499-28A(B).</p> <p>Added 2(3)-1501-3A and 2(3)-1501-3B.</p> <p>Changed RV-00D to RV-00C for 2(3)-0220-59 and 2-1201-158.</p> <p>Removed 2(3)-0299-68A through 2(3)-0299-68E.</p> <p>Changed 2(3)-1501-38A and 2(3)-1501-38B to category B.</p> <p>Included open stroke for 2(3)-1501-5A(B,C,D)</p>



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Class 1, 2 and 3 Valve Listing(cont.)	11-1 to 11-122	The following valves were previously included in the IST program with the test as "NA" for local tracking purposes. The IST basis document now provides this information and these valves have been removed from the IST plan:  <div style="display: flex; justify-content: space-between;"> <div> <p>2(3)-0202-4A</p> <p>2-0202-7A</p> <p>2(3)-220-51</p> <p>2(3)-0305-120</p> <p>2(3)-0305-122</p> <p>2(3)-2599-26A</p> <p>2(3)-7503</p> </div> <div> <p>2(3)-0202-4B</p> <p>2-0202-7B</p> <p>2(3)-220-52</p> <p>2(3)-0305-121</p> <p>2(3)-0305-123</p> <p>2(3)-2599-26B</p> <p>3-8941-101</p> </div> </div> <p>Changed 2(3)-2301-64 to class 2.</p> <p>Valves 2-0301-95 and 2-0301-98 have been removed from the plan. These valves have been removed from service as part of a system modification.</p> <p>Removed the cold shutdown CT-C and justification CS-00B for the following valves:</p> <div style="display: flex; justify-content: space-between;"> <p>2(3)-1402-36A(B)</p> <p>2(3)-1501-66A(B)</p> </div> <p>2(3)-2354-501</p> <p>Relief valves 3-0302-158A and 3-0302-158B perform no safety function and they are being evaluated for removal from the system. They have been removed from the plan.</p> <p>RVWLIS valves 2(3)-0299-97A, 2(3)-0299-97B, 2(3)-0299-98A, 2(3)-0299-98B, 2(3)-0299-99A, 2(3)-0299-99B, 2(3)-0299-100A, and 2(3)-0299-100B have been added due to system modification.</p> <p>Added RV-00A to valves 2(3)-2599-5A and 2(3)-2599-5B. This reference had inadvertently been left off.</p> <p>Corrected typographical error for 2-2599-4A by changing 2V-00A to RV-00A.</p> <p>Changed the required test for 2(3)-1501-3A and 2(3)-1501-3B from CT-O/CT-C to BT.</p> <p>Removed CS-15A, changed test frequency from CS to OP, and added open stroke for valves 2(3)-1501-32A and 2(3)-1501-32B.</p> <p>Added requirement to stroke closed and partial stroke open check valves 2(3)-1501-65A, 2(3)-1501-65B, 2(3)-1501-65C, and 2(3)-1501-65D.</p> <p>Removed valve 2/3-3999-336 from plan. The IST Basis Document reflects that this valve has no safety function.</p> <p>Corrected the PIT frequency from OP to RR for valves 2/3-5741-048A and 2/3-5741-048B.</p> <p>Added requirement to CT-C 2(3)-1402-8A and 2(3)-1402-8B.</p> <p>Added RV-14C to perform CT-C for 2(3)-1402-9A and 2(3)-1402-9B on a Refuel Outage frequency.</p>

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Class 1, 2 and 3 Valve Listing(cont.)	11-1 to 11-122	Added CT-O to 3-1402-34B which had inadvertently been dropped.  Added 2(3)-1499-14 and 2(3)-1499-15.  Added requirement to CT-C 2(3)-2301-51.  Added CT-C & AT, including reference to RV-00A and RV-37A for 2(3)-3769-500.  Added check valves 2-3999-634, 2-3999-638, 3-3999-640 and 3-3999-642 due to system modification.  Added the requirement to CT-C at OP 2(3)(2/3)-6699-104.  Added FST for 2(3)(2/3)-6699-103.  Added BT, FST, and reference to RV-66A for 2(3)(2/3)-6699-105.  Modified the stroke direction for the following valves:  2(3)-1301-10 - added close stroke. 2(3)-8941-709 - added close stroke. 2(3)-8941-710 - added close stroke. 2(3)-2301-6 - added open stroke. 2(3)-2301-4 - added open stroke. 2(3)-2301-5 - added open stroke. 2(3)-1601-21 - added open stroke. 2(3)-1601-60 - added open stroke.  Removed duplicate listing of valve 2-1501-27A.  Corrected error to change frequency of CT-C for 2(3)-0205-27 to RR.  Added CT-O at OP for 2(3)-220-58B and 2(3)-220-62B.  Removed TV-00C and changed the test frequency to RR for 2(3)-2399-76A(B) and 2(3)-2399-77A(B).  Included TV-00B for 2(3)-0220-44 and 2(3)-0220-45.  Removed CS-47A and CT-C for 2(3)-2599-22.  Changed valve numbers as follows:  1. 3-1402-34A to 3-1499-34A. 2. 2/3-3999-200 to 2/3-1599-103.  Valves 2(3)-2399-76A and 2(3)-2399-76B are Class 2 and have been moved from the Augmented valve listing to the Class 1, 2, and 3 valve listing.  Corrected stroke test abbreviation for 2-1001-2A to BT.  Removed AT and RV-00A from 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.  Changed frequency of Class 2 and 3 relief valves from 5 to 10 years.

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Class 1, 2 and 3 Valve Listing (Cont.)	11-1 to 11-122	Added CT-C for 2(3)-1501-1A, 2(3)-1501-1B, 2(3)-1501-1C, and 2(3)-1501-1D.																					
		Added TV-00C for 2-2301-39.																					
		Removed valves 2(3)-0202-9A and 2(3)-0202-9B. Valves have been electrically disconnected.																					
		Added Rv-02H for MSIVs 2(3)-0202-1A(B) (C) (D) and 2(3)- 0202-2A(B) (C) (D).																					
		Removed RV-00A for all flow-limiting check valves.																					
		Removed TV-23A for valves 2(3)-2301-68 and 2(3)-2301-69.																					
		Changed frequency of Safety Relief Valves 2(3)-0203-4(A- H) from RR to 5 years.																					
Augmented Valve Listing	12-1 to 12-67	Added 2(3)-0301-122.																					
		Added 2(3) (2/3)-4699-316.																					
		Changed the following valve number 2(3)-2541-01 to 2(3)-2599-79.																					
		Changed category for 2(3)-1599-61 and 2(3)-1599-62 from Category A to Category B. In addition, removed RV-00A and added TV-00F.																					
		Removed the following valves:																					
		<table style="margin-left: 40px; border: none;"> <tr> <td>2-1699-85A</td> <td>3-1699-85</td> <td>2(3)-1699-96</td> </tr> <tr> <td>2(3)-4102</td> <td>2(3)-4399-73</td> <td>2(3)-4399-74</td> </tr> <tr> <td>3-5202C-501</td> <td>3-5202C-502</td> <td>2(3)-4799-511</td> </tr> <tr> <td>2(3)-0301-166A</td> <td>2(3)-0301-166B</td> <td>2(3)-5425</td> </tr> <tr> <td>2(3)-1901-40</td> <td>2(3)-4799-511</td> <td>2(3)-7503</td> </tr> <tr> <td>2-1699-65A(B)</td> <td>3-1699-63A(B)</td> <td>2(3)-4107-501</td> </tr> <tr> <td>2(3) (2/3)-5202B-500</td> <td></td> <td>2(3) (2/3)-5202B-501</td> </tr> </table>	2-1699-85A	3-1699-85	2(3)-1699-96	2(3)-4102	2(3)-4399-73	2(3)-4399-74	3-5202C-501	3-5202C-502	2(3)-4799-511	2(3)-0301-166A	2(3)-0301-166B	2(3)-5425	2(3)-1901-40	2(3)-4799-511	2(3)-7503	2-1699-65A(B)	3-1699-63A(B)	2(3)-4107-501	2(3) (2/3)-5202B-500		2(3) (2/3)-5202B-501
		2-1699-85A	3-1699-85	2(3)-1699-96																			
2(3)-4102	2(3)-4399-73	2(3)-4399-74																					
3-5202C-501	3-5202C-502	2(3)-4799-511																					
2(3)-0301-166A	2(3)-0301-166B	2(3)-5425																					
2(3)-1901-40	2(3)-4799-511	2(3)-7503																					
2-1699-65A(B)	3-1699-63A(B)	2(3)-4107-501																					
2(3) (2/3)-5202B-500		2(3) (2/3)-5202B-501																					
Added RV-52A to 3-5202C-500.																							
Removed CT-C for the Back Draft Dampers.																							
Added CT-C at SAM to 2(3)-2301-51.																							
Changed frequency from OP to RR for 2(3)-0399-525.																							
Removed from CT-C 2(3)-1901-27A(B) and added RV-19A.																							
Added NSR check valves 2(3)-1901-55, 2(3)-1901-16A, and 2(3)-1901-16B for CT-O with reference to RV-19A.																							
Added 2(3)-2301-15 and 2(3)-2301-30.																							
Removed valves 2(3)-0302-166A and 2(3)-0302-166B.																							
Changed testing frequency of valves 2(3)-2301-77A and 2(3)-2301-77B from SAM to RR.																							
Added valves 2(3) (2/3)-6699-105.																							

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FOR DOCKET NUMBERS 50-237 AND 50-249

<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>
Augmented Valve Listing	12-1 to 12-71	Added FST for the following valves: 2(3)-0302-19A      2(3)-0302-19B      2(3)-0302-20A 2(3)-0302-20B      2(3)-0305-117      2(3)-0305-118 2(3)-0399-524A      2(3)-0399-524B      2(3)-0399-548A 2(3)-0399-548B      2(3)-0399-549A      2(3)-0399-549B  Removed RV-00A for valves 2(3)1601-32(A-F) and 2(3)-1601-33(A-F).  Changed Relief Requests to Technical Approach and Positions as follows:  1.      RV-02D to TV-02A. 2.      RV-03A to TV-03A. 3.      RV-03B to TV-03B. 4.      RV-03C to TV-03C. 5.      RV-23D to TV-23B. 6.      RV-47A to TV-47A. 7.      RV-66A to TV-66A.  Changed frequency from CS to RR for 3-0302-19A, 3-0302-19B, 3-0302-20A, and 3-0302-20B.
Valve Relief Request Index	13-1 to 13-4	The index was updated to reflect:  1.      New revisions to RV-02E, RV-03B, RV-13A, RV-14B, RV-15B, RV-23A, RV-23B, RV-23C, RV-23D & RV-24A.  2.      Addition of RV-02G, RV-02H, RV-14C & RV-37A.  3.      Conversion of RV-02D, RV-03A, RV-03C, RV-47A, RV-66A to Technical Approach and Positions.
Relief Request RV-02D	NA	Converted to TV-02A with additional modification.
Relief Request RV-02G	14-10 to 14-11	This Relief Request supports the testing of Reactor Vessel Water Level Indication System Backfill check Valves.
Relief Request RV-02H	14-12	Added to support testing per Technical Specifications including guidance of NUREG 1482 Section 4.2.4
Relief Request RV-03A	NA	Converted to TV-03A with additional modification.
Relief Request RV-03B	14-14 to 14-15	Removed frequency specific information, referenced Technical Specifications. Tech specs are subject to periodic revision, including issuance of Standardized Technical specifications. Non-Code components moved to TV-03B.
Relief Request RV-03C	NA	Converted to TV-03C with additional modification.
Relief Request RV-13A	14-18	Deleted valves 2(3)-1301-36 and 2(3)-4107-501.

ATTACHMENT 2  
SUMMARY OF CHANGES  
INDEPENDENT OF SAFETY EVALUATION  
FOR DOCKET NUMBERS 50-237 AND 50-249

<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>
Relief Request RV-14B	14-21	Changed valve number 3-1402-34A to 3-1499-34A. Added 2(3)-1402-36A and 2(3)-1402-36B.
Relief Request RV-14C	14-22	Added Relief Request to perform CT-C for valves 2(3)-1402-9A and 2(3)-1402-9B on Refuel Outage frequency.
Relief Request RV-15B	14-25	Added 2(3)-1501-66A and 2(3)-1501-66B.
Relief Request RV-23A	14-26 to 14-27	Added Relief from partial stroke exercise and removed partial stroke from alternate test.
Relief Request RV-23B	14-28 to 14-29	The dose rate level was modified to indicate significant dose rates vice a specific number.
Relief Request RV-23C	14-30	Added 2(3)-2354-501. Modified to include condition that these valves are not normally required to be operable.
Relief Request RV-23D	14-31 to 14-32	Changed 2(3)-2399-76A and 2(3)-2399-76B to Class 2. Moved non-Code components to TV-23B.
Relief Request RV-24A	14-40	Additional information including guidance of NUREG 1482 Section 4.1.4 is provided in the justification. No longer seeks relief from open stroke test of 2(3)-2499-28A and 2(3)-2499-28B
Relief Request RV-37A	14-43	This Relief Request supports the testing of RWCU check valve 2(3)-3769-500.
Relief Request RV-47A	NA	Converted to TV-47A with additional modification.
Relief Request RV-66A	NA	Converted to TV-66A with additional modification.
Valve Technical Approach and Position Index	15-1 to 15-2	The index was updated to reflect the following: <ul style="list-style-type: none"> <li>1. New revisions to TV-00A, TV-00B and TV-00C.</li> <li>2. The addition of TV-02A, TV-03A, TV-03B, TV-03C, TV-19A, TV-23B, TV-47A, TV-52A, and TV-66A.</li> <li>3. The removal of TV-00D, TV-00E, TV-23A, TV-25A and TV-75A.</li> </ul>
Technical Approach and Position TV-00A	16-1 to 16-2	Discussion and position has been clarified.

ATTACHMENT 2  
SUMMARY OF CHANGES  
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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>
Technical Approach and Position TV-00B	16-3 to 16-4	Added 2(3)-0220-44 and 2(3)-0220-45.
Technical Approach and Position TV-00C	16-5 to 16-7	Removed reference to the following valves: <ol style="list-style-type: none"> <li>1. HPCI Turbine exhaust vacuum breakers.</li> <li>2. Core Spray keep fill check valves.</li> <li>3. LPCI keep fill check valves.</li> <li>4. HPCI keep fill check valves.</li> </ol> Changed classification of valve 2(3)-1301-11 to SR and deleted valves 2(3)-1301-10 and 2(3)-4107-501.
Technical Approach and Position TV-00D	NA	Deleted.
Technical Approach and Position TV-00E	NA	Deleted.
Technical Approach and Position TV-02A	16-8	Previously RV-02D with modified discussion and position.
Technical Approach and Position TV-03A	16-9 to 16-10	Previously RV-03A with modified discussion and position.
Technical Approach and Position TV-03B	16-11	Non-Code components that were previously in RV-03B with modified discussion and position.
Technical Approach and Position TV-03C	16-12 to 16-13	Previously RV-03C with modified discussion and position.
Technical Approach and Position TV-19A	16-14	Added to support testing of Fuel Pool Cooling System Check valves.
Technical Approach and Position TV-23A	NA	Deleted.

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<u>ITEM</u>	<u>PAGE(S)</u>	<u>DESCRIPTION OF CHANGE</u>
Technical Approach and Position TV-23B	16-15	Non-Code components that were previously included with RV-23D.
Technical Approach and Position TV-25A	NA	Deleted this Technical Approach and position in conjunction with the removal of the referenced valves from the plan.
Technical Approach and Position TV-47A	16-16	Previously RV-47A with modified discussion and position.
Technical Approach and Position TV-52A	16-17	Added to support testing of valve 3-5202C-500.
Technical Approach and Position TV-66A	16-18	Previously RV-66A with modified discussion and position.
Technical Approach and Position TV-75A	NA	Deleted this Technical Approach and position in conjunction with the removal of the referenced valves from the plan.
Cold Shutdown Justification Index	17-1	The Cold Shutdown Justification Index was revised to reflect the following: <ol style="list-style-type: none"> <li>1. New revision of CS-02C.</li> <li>2. The removal of CS-00B and CS-15A.</li> <li>3. The addition of CS-23A.</li> </ol>
Cold Shutdown Justification CS-00B.	NA	Removed this Cold Shutdown Justification.
Cold Shutdown Jusstification CS-02C	18-4	Deleted valves 2(3)-0299-68A through 2(3)-0299-68E.
Cold Shutdown Justification CS-15A.	NA	Deleted this Cold Shutdown Justification. The referenced valves will be tested on a quarterly basis.
Cold Shutdown Justification CS-23A.	18-8	Added this Cold Shutdown Justification as referenced by the existing Relief Request RV-23B. CS-23A was inadvertently forgotten during previous revisions.