Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

ComEd

October 16, 1995

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

Subject: Dresden Nuclear Power Station Unit 2
Recirculation System and Reactor Head
Flaw Indication Evaluations
NRC Docket No. 50-237

Reference: (a) ASME Section XI, 1989 Edition
(b) U.S. NRC Generic Letter 88-01

The purpose of this letter is to provide ComEd's assessments of the impact on the operation of Dresden Unit 2 given the slag inclusion detected on the reactor head flange weld and the crack indications found in 2 IGSCC susceptible stainless steel welds in the reactor recirculation piping during the D2R14 refueling outage.

Ultrasonic examination of 50 percent of the Dresden Unit 2 RPV head flange weld during the D2R14 outage identified a subsurface flaw with 0.52 inch in planar depth, 3.4 inch in length and 0.53 inch below the O.D. surface. ComEd's assessment determines that the acceptance criteria of the ASME Code Section IWB-3600 for both normal/upset and emergency/faulted conditions is met for the next 10 fuel cycles. Per ASME Section XI, Subarticle IWB-2430 the remaining 50% of the weld will be examined this outage.

Also, during ultrasonic examinations on IGSCC susceptible stainless steel weldments in the reactor recirculation system piping during the D2R14 outage found flaw indications exceeding the acceptance criteria in IWB-3514 of ASME Section XI at weld PD1A-D14 and PS2-TEE/202-4B. The indication found at weld PD1A-D14 imposes a more restrictive operational limit than the indications found at weld PS2-TEE/202-4B. ComEd's assessment is that code allowable will be met for a minimum of 35000 hours of system operation i.e., more than two fuel cycles.

These assessments conclude that these flaws exceed the Reference (a) acceptance standard. Per the requirements of Reference (b), ComEd requests NRC Staff review and acceptance of a return to operating mode of Dresden Unit 2 at the end of the scheduled refueling outage. NRC acceptance is requested by November 17, 1995.

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To the best of my knowledge and belief, the statements contained in this response are true and correct. In some respects, these statements are not based on my personal knowledge, but obtained information furnished by other ComEd employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

If there are any questions regarding this submittal, please contact this office.

Sincerely,

Bob Ryb~~a~~k
Nuclear Licensing Administrator

Attachments:
A. Structural Flaw Evaluation of Head Flange Weld at Dresden Nuclear Power Station, Unit 2, dated 10/16/95
B. Dresden Unit 2 Recirculation Line Flaw Evaluation Report, Rev. O, dated 10/12/95

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

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ATTACHMENT A