



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

April 16, 1996

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

SUBJECT: REVISION 3 TO THE THIRD 10-YEAR INTERVAL INSERVICE TESTING  
PROGRAM - DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 (TAC  
NOS. M93566 AND M93567)

Dear Mr. Farrar:

By letter dated August 31, 1995, as supplemented November 30, 1995, you submitted Revision 3 to the Third Ten-Year Interval Inservice Testing (IST) Program for Pumps and Valves for the Dresden Nuclear Power Station, Units 2 and 3. The revision included changes to the IST Program and requested new reliefs and modified previously approved reliefs from certain provisions of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) pursuant to 10 CFR 50.55a. Our Safety Evaluation (SE) is included as Enclosure 1.

Revisions 1 and 2 to the Dresden IST Program third ten-year interval were submitted June 30 and September 10, 1993, respectively. Revision 3 superseded Revisions 1 and 2; however, several relief requests were approved in NRC's SE for the original third ten-year interval program dated September 11 and December 17, 1992, that remain in effect. Those relief requests previously approved, that were revised in Revision 3 of the third ten-year IST Program, have been found by the staff to remain valid. The basis for this is stated in Section 2.0 of the enclosed SE.

10 CFR 50.55a requires that the IST of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Code, except where alternatives are authorized or relief is granted by the Commission pursuant to paragraphs (a)(3)(i), (a)(3)(ii), or (f)(6)(i). In order to obtain authorization or relief, the licensee must demonstrate that (1) the proposed alternatives provide an acceptable level of quality and safety, (2) compliance would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety, or (3) conformance is impractical for its facility. Guidance on acceptable alternatives to Section XI requirements for certain aspects of the IST program was provided by the NRC in Generic Letter (GL) 89-04.

The staff has reviewed the new and revised relief requests. Relief Requests RP-14A, RV-02A (in part), RV-14B, RV-23C, RV-15B, RV-23H, and RV-57A, are granted pursuant to 10 CFR 50.55a(f)(6)(i) due to impracticalities and in

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consideration of the burden on the licensee if the Code requirements were imposed. Relief Requests RP-11C and RV-02A (in part) are authorized pursuant to 10 CFR 50.55a(a)(3)(ii) due to the hardship without a compensating increase in the level of quality and safety. Relief Requests RV-02G, RV-02H, RV-14C, RV-23D, RV-23E, RV-25A and RV-37A, conform to guidance in GL 89-04 or its Supplement 1 and are approved accordingly.

The staff is granting relief from certain testing requirements that are impractical to perform and authorizing proposed alternatives where compliance with the ASME Code would result in a hardship without a compensating increase in safety or where alternative testing provides an adequate level of quality and safety. The relief granted is authorized by law and will not endanger life or property or the common defense and security and is otherwise in the public interest giving due consideration to the burden that could result if the requirement were imposed on the facility. The specific details are contained in the enclosed SE.

Sincerely,



Robert A. Capra, Project Director  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249

Enclosure: Safety Evaluation

cc w/encl: see next page

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Dresden Nuclear Power Station  
Unit Nos. 2 and 3

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