

Commonwealth Edison Company
Dresden Generating Station
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Tel 815-942-2920

ComEd

September 5, 1996

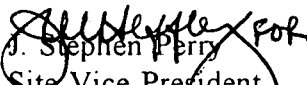
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U.S. Nuclear Regulatory Commission
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Washington, D. C. 20555

Subject: Dresden Nuclear Power Stations Unit 3
Submittal of Relief Request RV-02I for the
Inservice Testing Program
NRC Docket Nos. 50-249

Commonwealth Edison (ComEd) has recently moved the start of the fourteenth refueling outage for Unit 3 (D3R14) to the Spring of 1997. To facilitate this change in schedule, ComEd is requesting relief from both the 5 year and 24 month test frequency requirements of ASME Code, 1986 Edition Section XI, Subsection IWV-3511 (OM-1-1981) for the Unit 3 ASME Class 1 Main Steam safety valves and the Target Rock pressure/relief valve. ComEd requests that approval of the relief request be provided by 10/08/96 to avoid a shutdown of Unit 3. Please address any questions concerning this relief request to F. Spangenberg, Regulatory Assurance Manager, (815)-942-2920, extension 3800.

Sincerely,


J. Stephen Perry
Site Vice President
Dresden Station

Attachment: Relief Request RV-02I

cc: A. W. Beach, Regional Administrator, Region III
NRC Resident Inspector's Office
Illinois Department of Nuclear Safety
J. Stang, Dresden Project Manager

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DESCRIPTION

Relief is requested from OM-1-1981 testing frequency requirements for the Target Rock Safety/Relief Valve and the Main Steam Safety Valves.

COMPONENT IDENTIFICATION/FUNCTION

<u>VALVE</u>	<u>SIZE</u>	<u>CAT</u>	<u>CLASS</u>	<u>P&ID/ CORD</u>	<u>FUNCTION</u>
3-0203-3A	6"	BC	1	345-1/7F	Main Steam Target Rock Safety/ Relief Valve
3-0203-4A	6"	BC	1	345-1/8E	Main Steam Safety Valve
3-0203-4B	6"	BC	1	345-1/8E	"
3-0203-4C	6"	BC	1	345-1/8D	"
3-0203-4D	6"	BC	1	345-1/8D	"
3-0203-4E	6"	BC	1	345-1/8C	"
3-0203-4F	6"	BC	1	345-1/8C	"
3-0203-4G	6"	BC	1	345-1/8B	"
3-0203-4H	6"	BC	1	345-1/8B	"

CODE REQUIREMENT(S)

OM-1-1981, Paragraph 1.3.3.1.2 All valves of each type and manufacture shall be tested within each subsequent five year period with a minimum of 20% of the valves tested within any 24 months.

BASIS FOR RELIEF

Current Dresden Technical Specification Surveillance Requirement 4.6.E dictates that a minimum of 1/2 of all Main Steam safety valves shall be bench checked or replaced with a bench checked valve each refueling outage.

The third ten-year testing interval for Dresden Station, Units 2 and 3, began on March 1, 1992. The Dresden IST Program was updated to the requirements of the 1986 Edition of Section XI for the third ten-year testing interval. The 1986 Edition of Section XI requires overpressure relief devices to be tested in accordance with ASME OM-1-1981. OM-1-1981 requires all Class 1 valves of each type and manufacturer to be tested within each subsequent five year period with a minimum of 20% of the valves tested within any 24 months. Main Steam safety valves 3-203-4A through 4H are of the same type and manufacturer but the Target Rock safety/relief valve, 3-203-3A is not. Per OM-1-1981 requirements, valve 3-203-3A is in a test group by itself,

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while the remaining Main Steam safety valves are grouped together. In order to satisfy Technical Specification Surveillance Requirements, the Target Rock safety/relief valve and 1/2 of the remaining previously untested safety valves are tested or replaced with pretested valves each refueling outage.

Dresden operating cycles are currently on an 18 month frequency. Therefore, testing at the Technical Specification 4.6.E frequency ensures compliance with OM-1-1981 since the Technical Specification frequency is usually more restrictive. However, the duration of the last two Unit 3 refueling outages (D3R12 and D3R13) were longer than a typical refuel outage. The D3R12 refueling outage duration was 9 months (9/8/91 to 4/15/92). The D3R13 refueling outage duration was 8 months (3/8/94 to 11/3/94). The D3R14 refueling outage start was scheduled for 9/7/96, but it has been delayed due to an unforeseen duration of forced outages since the last refueling outage. D3R14 is expected to begin in the Spring of 1997. Unit 3 is currently in cold shutdown and is scheduled for startup on 9/10/96.

OM-1-1981 requires all valves in each ASME Class 1 test group to be tested within the initial and all subsequent five (5) year periods. Therefore, testing of Main Steam safety valves 3-0203-4E, 4F, 4G and 4H is required by 10/8/96 since these valves were tested last on 10/08/91.

Additionally, OM-1-1981 requires that a minimum of 20% of the valves of each type and manufacturer be tested within any 24 month period. Main steam safety valves 3-0203-4A, 4B, 4C and 4D were last tested on 6/13/94 and the Target Rock safety/relief valve, 3-0203-3A, was last tested on 6/24/94. To comply with the OM-1-1981 24 month frequency, ComEd must test at least 2 Main Steam safety valves prior to 12/13/96 and the Target Rock prior to 12/24/96, since in this case, OM-1-1981 is more restrictive than the applicable Technical Specifications.

Relief is requested from the test frequency requirements of OM-1-1981 as these tests would result in hardship without a compensating increase in quality or safety. To facilitate maintenance and testing activities during refueling outages, temporary shielding is required to be installed to reduce personnel exposure. Personnel radiation exposure for safety valve removal and replacement without shielding would result in exposures of approximately 300% of the exposure with temporary shielding installed. The estimated exposure for safety valve removal and replacement prior to startup is one man-rem per valve. Removal and replacement of Main Steam safety valves is estimated to require 72 hours per valve. Per OM-1-1981 requirements, when satisfying testing requirements by installing a partial complement of pretested valves, all valves removed must be tested prior to plant startup. Therefore, additional critical path time would be added to facilitate testing of removed valves and could result in a delay in the return to power operation. Further, the Dresden Technical Specifications will require that the Target Rock safety/relief valve and four Main Steam safety valves

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be tested during the upcoming D3R14 refueling outage.

Per the guidance of NUREG-1482, Section 3.1.3: '...the licensee would not extend the test intervals for safety and relief valves defined in OM-1-1981... other than to coincide with a refueling outage... A 25% extension may be applied to the 2 years unless the Technical Specification or relief request stipulate "whichever is more conservative," or a statement to this effect.' ComEd believes that deferral of testing the Main Steam safety valves and the Target Rock until D3R14 (February 1997) is consistent with the guidance provided in NUREG 1482 and is consistent with the Technical Specifications. ComEd also considers testing of the four Main Steam safety valves and the Target Rock Safety/Relief valve prior to startup from the current force outage and testing an additional four Main Steam safety valves and the Target Rock Safety/Relief valve again during the upcoming D3R14 outage to be overly burdensome and beyond the intent of the ASME Code.

PROPOSED ALTERNATIVE

In lieu of the testing per frequency requirements of OM-1-1981, Paragraph 1.3.3.1.2., Dresden Unit 3 Main Steam safety valves 3-0203-4E, 4F, 4G, 4H, and the Target Rock safety/relief valve 3-0203-3A will be tested and replaced with pretested valves during the upcoming refueling outage (D3R14). This alternative will provide one time schedular relief from the 5 year and 24 month test intervals for the Main Steam safety valve group and one time schedular relief for the 24 month test interval for the Target Rock safety/relief valve.