

October 8, 1996

Ms. Irene Johnson, Acting Manager
Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: EVALUATION OF INSERVICE TESTING RELIEF REQUEST - DRESDEN NUCLEAR
POWER STATION, UNIT 3 (TAC NO. M96507)

Dear Ms. Johnson:

By letter dated September 5, 1996, you submitted a one-time request for relief 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 for certain plant safety/relief valves.

As required by 10 CFR 50.55a, inservice testing (IST) of certain ASME Code Class 1, 2, and 3 pumps and valves must 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 89-04.

The staff has reviewed the relief request proposed in your September 5, 1996, letter. The alternative you have proposed to the ASME Code testing of the main steam safety valves and the safety/relief valve is authorized pursuant to 10 CFR 50.55a(a)(3)(ii) in that compliance with the code requirements would result in hardship without a compensating increase in the level of quality and safety. The specific details are contained in the enclosed SE.

Sincerely,

Original signed by: Clyde Shiraki for

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

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PDR ADOCK 05000249
PDR

Docket No. 50-249

Enclosure: Safety Evaluation

cc w/encl: see next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in dark ink, appearing to read "Capra" followed by a flourish, is positioned above the typed name of the Project Director.

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

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Enclosure: Safety Evaluation

cc w/encl: see next page

I. Johnson
Commonwealth Edison Company

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