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Dresden Generating Station  
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February 14, 1997

JSPLTR: #97-0031

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

Attn.: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 2  
Dresden Station Unit 2 Refueling Outage 14 (D2R14)  
NRC Docket No 50-237

The purpose of this letter is to provide an update of significant accomplishments made at Dresden Station during the 1995-96 Unit 2 refuel outage and to reaffirm to the NRC ComEd's commitment to address long standing material condition issues at Dresden Station. This letter is provided for the information of your Staff. No response to this letter is requested.

Dresden Station completed a major maintenance and refuel outage for Unit 2 in April 1996 during which many outstanding safety, materiel condition, and regulatory issues were addressed. The more significant accomplishments during D2R14 are listed below:

- Forty-one control rod drives were replaced.
- Seventeen Guide Tube were vacuumed.
- Fifty-one motor operated valves were overhauled
- Reactor vessel shroud was repaired to eliminate horizontal welds subject to cracking.
- Reactor Water Cleanup System piping and heat exchangers were replaced. All asbestos was removed. Numerous welds were eliminated to reduce radiation exposure during Inservice Inspections.
- Shielded metallic insulation was installed on the Reactor Recirculation Pump Discharge piping.
- Two Shutdown Cooling (SDC) inlet header valves were replaced.
- The three low pressure rotors of the Unit 2 turbine were disassembled and inspected following the Unit 3 forced outage caused by a blade failure in that turbine.
- 2A Core Spray Pump was rebuilt.
- All Circulating Water expansion-joint boots were replaced.

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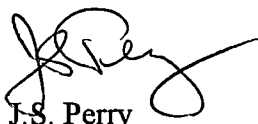
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- All Condenser tubes were cleaned and inspected. Three hundred thirty tubes were plugged.
- The reactor bottom head drain line was unplugged.
- The Feedwater Control valves and control system were replaced.
- Work on motor operated valves required by Generic Letter 89-10 was completed.
- The Scram Discharge Volume Scram Logic Design was modified to bring it into compliance with the UFSAR.
- 2A Low Pressure Coolant Injection (LPCI) Pump and motor were refurbished.
- The LPCI heat exchanger support steel was upgraded to meet UFSAR stress limits.
- 2A Reactor Recirculating Pump mechanical seal was replaced.
- The Reactor Recirculating Pump Discharge Valve Bypass lines were removed.
- 2C Main Steam Isolation Valve was repaired to reduce leakage through the valve.
- 2B SDC Heat Exchanger was disassembled and leaking tubes were plugged.
- The second off-gas train was made available.
- The Depleted Zinc Oxide Addition System was installed.
- The Unit 2 Station Black-out Diesel Generator was installed and made operable.
- The torus was cleaned and desludged.

Attachment A to this letter provides a summary of applicable NRC commitments completed during the refuel outage.

If you have any further questions regarding this matter, please contact Mr. Frank Spangenberg at (815) 942-2920 Ext. 3800.

Sincerely,



J.S. Perry  
Site Vice President  
Dresden Station

cc: A. B. Beach, Regional Administrator -- RIII  
J. F. Stang, Project Manager - NRR  
J. Hopkins, Acting Senior Resident Inspector, Dresden Station  
Office of Nuclear Safety - IDNS

**ATTACHMENT A**  
**SUMMARY OF D2R14 OUTAGE WORK ON REGULATORY RELATED ITEMS**

References	Subject	Discussion
LER 237/95020,	UNIT 2 LLRT ISSUES	COMPLETE UNIT 2 JUSTIFICATION FOR REVERSE TESTING OF PRIMARY CONTAINMENT ISOLATION VALVES AND UNCHALLENGED POTENTIAL PRIMARY CONTAINMENT LEAKAGE PATHS.
LER 237/95020 REV 0	UNIT 2 JUSTIFICATION FOR REVERSE TESTING OF PRIMARY CONTAINMENT	THE LICENSE'S EVALUATION AND CORRECTIVE ACTIONS WERE DOCUMENTED IN A NON-CITED VIOLATION WAS ISSUED FOR FAILURE TO PERFORM
(TPJLTR # 95-0117)	OOS AND COFIGURATION CONTROL	ALL ELECTRICAL DISTRIBUTION CENTERS AND VALVES WERE WALKED DOWN PRIOR TO STARTUP WHILE SYSTEM CHECKLISTS WERE BEING PERFORMED . THIS INCLUDED NORMALLY NON-ACCESSIBLE AREAS.
IEB 95-02	ECCS STRAINER INSPECTIONS - UNIT 2	DOS 1600-19, "SUPPRESSION CHAMBER CLOSEOUT INSPECTION" AND DOS 1600-10 "DRYWELL CLOSEOUT INSPECTION PLAN", WERE PERFORMED PRIOR TO STARTUP FROM D2R14.
IN 94-049	MOV 2-1501-32A AND 2-1301-4 TORQUE SWITCH	TORQUE SWITCH WAS REPLACED ON EACH VALVE 2-1301-4, 2-1501-32A WR 930056294-03
Part 21 93-T146	AMERACE RELAY PART INTERCHANGE TECHNICAL ISSUE.	INSPECT U-2 RELAYS FOR LOCKING SPRING OR STRAP THAT IS INCORRECT SIZE.
LER 2-93-026	REPAIR/REPLACE MSIV SEAT RINGS	INSTALLED RETROFIT KITS. (REPLACED 4 MSIV SEAT RINGS PER WORK REQUESTS 950018493; 950053324; 950018491; 950018492.
LER 94-028-00	TORUS SPRAY SUB-SYSTEM	INSTALL SUPPORT MODIFICATIONS FOR TORUS SPRAY SUB-SYSTEM TO RESOLVE OPEN OPERABILTIY CONCERNS FOR UNTI 2. INSTALLED EXEMPT CHANGE P12-2-94-225 ON TORUS 'A' LOOP, OPERATIONS AUTHORIZED 10/04/95, AND EXEMPT CHANGE P12-2-94-226 ON TORUS 'B' LOOP, OPERATIONS AUTHORIZED 10/06/95.
LER 2-95-005	REMOVE THE LIFT CHECK VALVES.	REMOVED REMAINING LIFT CHECK VALVES AND REPLACED WITH NEW ANCHOR DARLING SWING TYPE CHECK VALVES.
LER 2-95-015	1A AND 1C MAIN STEAM ISOLATION VALVES	1A AND 1C MSIV WERE INSPECTED, REPAIRED AND GIVEN AS-LEFT LLRTS.

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LER 2-95-018	HPCI TURBINE EXHAUST CHECK VALVE	HPCI CHECK VALVE WAS REMOVED, INSPECTED, REPLACED AND THE AS-LEFT LLRT YIELDED A LEAKAGE RATE OF 3.69 SCFH.
LER 3-94-11	REVISE PROCEDURES DEP 7300-09 AND DEP 7300-10	THE TWO PROCEDURES WERE APPROVED FOR USE ON 6/2/95. THE PROCEDURES WERE REWRITTEN TO PLACE THE JUMPERS ON TERMINAL STRIPS TO ALL TIE BRAKES TO BE OPERATED IF A FEED BREAKER IS REMOVED.
LER 2-96-001	4KV BREAKER FAILURES	LEVEL II INVESTIGATION RECOMMENDED NUMEROUS CHANGES IN ENGINEERING AND OPERATING PROCEDURES FOR INSPECTION AND TESTING OF 4KV BREAKERS.
LER 3-95-008	INSPECT MAIN STEAM ISOLATION VALVES (MSIV)	INSPECTED U-2 MSIVS FOR LIMIT SW. PROBLEMS FOUND AFTER U-3 SCRAM
LER 3-95-017	SETPOINT ON 2-1201-180	RELIEF VALVE WAS TESTED AND REPAIRED. SET PRESSURE WAS VERIFIED AT THE REQUIRED 160 PSIG.
LER 2-95-019	UNIT 2 SCRAM DISCHARGE VOLUME AND RPS LOGIC AND CABLE ROUTE	UNIT 2 SCRAM DISCHARGE VOLUME CABLE REROUTED. DESIGN RELEASED TO CORRECT CABLE ROUTING ISSUES. MODIFICATION WAS INSTALLED, TESTED, AND OPERATION AUTHORIZED.
I.R. 237/89012; 249/89011:	ISOLATION CONDENSER.	THE LAST PARTIAL MODIFICATION PACKAGE (M12-2-90-057D) ASSOCIATED WITH THE ISOLATION CONDENSER DIESEL DRIVEN MAKEUP PUMPS WAS INSTALLED AND TESTED DURING D2R14.
I. R. 237/90025; 249/90025	INTEGRATED CONTACT REVIEW PROGRAM	THE SRCTA PROGRAM REVIEWED 18 SAFETY RELATED SYSTEMS AND IDENTIFIED THE CONTACTS THAT WERE NOT ADEQUATELY TESTED WITH EXISTING STATION PROCEDURES. THE STATION PROCEDURES WERE REVISED PRIOR TO D2R14 OUTAGE. ALL THE CONTACTS WERE TESTED BY THE REVISED PROCEDURES. PERFORMED DURING THE LOGIC SYSTEM FUNCTIONAL TESTING AT THE END OF D2R14.
I.R. 237/91025; 249/91025	SAFETY RELATED CONTACT TESTING PROGRAM	COMPLETED ALL SURVEILLANCES THAT HAVE BEEN REVISED TO INCLUDE CONTACTS IDENTIFIED DURING THE SAFETY RELATED CONTACT TESTING ADEQUACY PROGRAM.

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I.R. 237/91038; 249/91042	480 VAC COORDINATION	FOLLOW-UP ACTION FROM THE EDSFI WAS TO INSTALL NEW SOLID STATE TRIP DEVICES IN ALL SAFETY RELATED 480V SWGR BREAKERS. . OF THE 35 AFFECTED BREAKERS, 33 ARE COMPLETE. THE REMAINING 2 CANNOT BE UPGRADED AT THIS TIME BECAUSE RMS 9 SOLID STATE DEVICES ARE NOT ENVIRONMENTALLY QUALIFIED. EC-2A TRIP DEVICES WILL REMAIN INSTALLED IN BREAKERS CONNECTING TR 28 TO SWITCHGEAR 28 AND SWGR 28 TO MCC 28-1. SEE JSPLTR 96-0041 FOR COMPLETE DETAILS.
I.R. 237/92021; 249/92021	TIME DELAY RELAY CALIBRATION	A DATA BASE WAS DEVELOPED WHICH IDENTIFIES DRESDEN UNIT 2 AND 3 TIME DELAY RELAYS (TDRS), TYPE OF RELAY, LOCATION, PRINT; SETTING, CALIBRATION RANGE ETC, AND THE TDR TEST PROCEDURE . ALL SAFETY RELATED TDRS ARE TESTED PER: "SAFETY RELATED TIME DELAY RELAY PROJECT (SRTDR) PROJECT REPORT FOR DRESDEN UNITS 2 AND 3 REVISION 0.
BULLETIN 93-02, SUPPLEMENT 1	EMERGENCY CORE COOLING SUCTION STRAINERS PLUGGING	DEGRADED INSULATION WAS REPLACED AND WALKDOWN COMPLETED. THE TORUS AND STRAINERS WERE CLEANED & INSPECTED, AND THE CONDITIONS WERE EVALUATED. DRYWELL CLOSE-OUT PERFORMED IN ACCORDANCE WITH DOS 1600-10. EXTENDED DURATION MULTIPLE ECCS PUMPS TESTS WERE PERFORMED, AND THE ECCS SUCTION STRAINERS WERE INSPECTED AND FOUND TO MEET THE CLEANLINESS REQUIREMENTS PROVIDED BY THE BWROG.

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INFORMATION NOTICE 89-6	BUSES 21 AND 22 INSPECTION	<p>BUSSES 21 AND 22 WERE INSPECTED DURING D2R13. THE INSPECTION BUS 23, BUS 24, BUS 23-1, BUS 24-1 ACCOMPLISHED THE FOLLOWING:</p> <p>DETERMINED THE TYPE OF BUS BAR INSULATION THAT IS USED ON THE 4KV SYSTEM AND THE MAIN AND AUXILIARY TRANSFORMERS.</p> <p>DETERMINED THE KIND OF GE BUS BAR JOINT COMPOUND THAT IS USED AND EVALUATED THE COMPOUNDS EFFECT ON THE INSULATION.</p> <p>PERFORMED A WALKDOWN OF THE 4KV CUBICLES AND THE MAIN AND AUXILIARY TRANSFORMER BUS BAR DUCT SYSTEMS AND TO ENSURE MOISTURE AND DEBRIS TIGHTNESS.</p> <p>REVIEWED THE NEED FOR PERIODIC INSPECTIONS AND/OR CLEANING OF BUS BAR AND HOUSINGS.</p>
GL 89-10	CORRECT SWITCH SETTINGS FOR MOVS	DAP 04-15 ESTABLISHED CORRECT SWITCH SETTINGS FOR MOVS. STATIC TESTS WERE PERFORMED PER THAT PROCEDURE.
GL 94-03	PERMANENT CORE SHROUD REPAIR	CORE SHROUD REPAIR WAS INSTALLED
LCS PART 21 REPORT OF SNUBBER FAILURE. 94-T108300	SNUBBER FAILURES	WALKED DOWN THE SNUBBERS AT DRESDEN AND FOUND TEN WHICH HAD THE SAME CONFIGURATION AS THOSE WHICH FAILED AT LASALLE COUNTY STATION. ONE WAS DISASSEMBLED BUT NO EVIDENCE OF EXCESSIVE WERE WAS FOUND.
LER 2-93-004	COMPARISON OF BIMETALLIC SWITCHES TO F-100 TEMPERATURE SWITCHES	FINAL RESOLUTION WAS TO CONTINUE USING EXISTING 16 SWITCHES IN THE X-AREA BUT MODIFIED IN ACCORDANCE WITH P12-3-94-266.

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LER 2-93-021	C&S CHECK VALVES	<p>THE PART 21 REPORTED DUAL DISC CHECK VALVES MANUFACTURED BY C&amp;S VALVES WITH VITON SEATS COULD DEGRADE THROUGH SEPARATION OF THE VITON SEAT FROM THE VALVE BODY. THE UNIT 2 VALVE, 2-2301-51, WAS DISASSEMBLED AND INSPECTED WITH NO SIGNS OF SEAT SEPARATION FROM THE VALVE BODY. BASED ON THE RELATIVELY SHORT SERVICE LIFE PRIOR TO FAILURE AND THE FACT THAT THIS VALVE WAS MANUFACTURED UNDER A SEPARATE C&amp;S JOB NUMBER THAN THOSE WHICH FAILED, THIS VALVE IS NOT CONSIDERED TO BE SUSCEPTIBLE TO THE FAILURE.</p> <p>THE 2-1501-1B AND 1D VALVES WERE REPLACED WITH GULF VALVE, MODEL MB30-2021-SRP-901. THESE VALVES HAVE BUNA-N INSTEAD OF VITON SEATS. THE REMOVED C&amp;S VALVE 2-1501-1B HAD ITS SEAT INTACT WITH MINOR SIGNS OF AGE IN THE RUBBER.</p> <p>THE 2-1501-63A,B VALVES WERE REPLACED DURING D2R14 WITH GULF VALVE, MODEL MB30-2021-SRP-901. NEITHER OF THE REPLACED C&amp;S VALVES SHOWED SIGNS OF SEAT DEGRADATION.</p>
LER 2-95-020	VALVE PACKING	<p>DTS 1600-01 WAS REVISED TO DOCUMENT THE TESTING REQUIREMENTS IN PRIMARY CONTAINMENT LEAKAGE RATE TESTING PROGRAM REVIEW TO PREVENT MISSED SURVEILLANCES ON THESE BOUNDARIES IN THE FUTURE. THE REVISION ALSO INCLUDES POSITIVE VERIFICATION THAT NO PRECONDITIONING OF MOVES OCCURRED. THE REVISION INCORPORATED THE ASPECTS OF 10 CFR 50, APPENDIX J OPTION B.</p>
LER #50-237	PILOT SOLENOID COIL FAILURE	<p>CIRCUIT CHANGES TO INDICATE PILOT SOLENOID COIL FAILURE IN A MSIV AC/DC CIRCUIT (LED INDICATION INSTALLED AND TESTED).</p>
LER 3-95-022	CRD SCRAM DISCHARGE VOLUME GALLERIES	<p>THE WALKDOWN OF THE CRD SCRAM DISCHARGE VOLUME DETERMINED THAT THERE WERE NO SEISMIC INTERACTION CONCERNS.</p>
INFO NOTICE 95-018	PRESSURE LOCKING, PRESSURE BINDING	<p>HOLES DRILLED ON THE REACTOR SIDE DISK OF THE VALVES: 2-1501-22A(B)</p>