

Commonwealth Edison Company  
Dresden Generating Station  
6500 North Dresden Road  
Morris, IL 60450  
Tel 815-942-2920



September 4, 1997

JSPLTR: #97-0153

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

Attn.: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 3  
Dresden Station Unit 3 Refueling Outage 14 (D3R14)  
NRC Docket No 50-249

The purpose of this letter is to provide an update of significant accomplishments made at Dresden Station during the spring 1997 Unit 3 refuel outage and to reaffirm to the NRC ComEd's commitment to address long standing materiel 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 3 in June 1997 during which many outstanding safety, materiel condition, and regulatory issues were addressed. The more significant accomplishments during D3R14 are listed below:

- 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.
- 3A Core Spray Pump Motor was repaired.
- The Unit 3 Main Generator inspection included the retaining rings, stator bars, collector ring, and complete electrical integrity.
- Approximately 400 Control Rod Drive Hydraulic Control Unit valves were repaired.
- Two Main Steam Isolation Valves (MSIVs) were modified to improve their reliability.
- The Feedwater Regulating Valves were overhauled and the control system was modified to incorporate three element control.
- Reactor Vessel Bottom Head Drain Line was unplugged.

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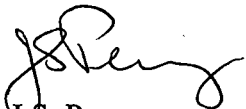


- The Depleted Zinc Oxide Addition System piping connections were made.
- The Unit 3 Station Black-out Diesel Generator was installed and made operable.
- Seven penetrations were modified to prevent thermal pressurization.
- Larger Emergency Core Cooling System (ECCS) suction strainers were installed in the torus.
- 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  
K. Riemer, Senior Resident Inspector, Dresden Station  
Office of Nuclear Safety - IDNS

**ATTACHMENT A**  
**SUMMARY OF D3R14 OUTAGE WORK ON REGULATORY RELATED ITEMS**

References	Subject	Discussion
IR 237/249/96201	UNIT 3 LLRT ISSUES	PLANNED MODIFICATIONS FOR LLRT REVERSE DIRECTION VALVES WERE COMPLETED FOR THE FOLLOWING VALVES : PCIV 3-0399-506, 3-1501-19A, 3-4722, 3-4720, 3-8501-3A, 3-1501-19B, 3-1501-28A, 3-1501-28B,
IEB 96-03	ECCS SUCTION STRAINER PLUGGING	LARGER SUCTION STRAINERS WERE INSTALLED PER MOD M12-3-96-006.
IEB 96-03	DEFERRAL OF REQUESTED ACTIONS	DRYWELL AND TORUS CLEANING AND INSPECTIONS WERE REPORTED BY JSPLTR 11 OF JUNE 16, 1997
IEB 95-02	ECCS STRAINER INSPECTIONS - UNIT 3	DOS 1600-19, "SUPPRESSION CHAMBER CLOSE-OUT INSPECTION" AND DOS 1600-10 "DRYWELL CLOSE-OUT INSPECTION PLAN", WERE PERFORMED PRIOR TO STARTUP FROM D3R14. THE U3 TORUS WAS DE-SLUDGED, THE ECCS RINGHEADER WAS CLEANED, AND THE TORUS COATING INSPECTION WAS COMPLETED UNDER WORK REQUEST 950056404.
IN 89-64	INSPECT BUS 34 & 34-1	BUSES WERE CLEANED AND INSPECTED: BUS 34 USING WORK REQUEST 950060862 BUS 34-1 USING WORK REQUEST 950060614.
PART 21 95 TI00	REVERSE POWER RELAY GGP	GGP RELAYS WERE SENT BACK TO TECH LABS FOR REPAIR. REPLACED CLUTCH MATERIAL WITH 100% WOOL MATERIAL
LER 2-93-026 LER 2-95-015 S1	REPAIR/REPLACE MSIV SEAT RINGS	INSTALLED RETROFIT KITS. REPLACED 2 MSIV SEAT RINGS ON UNIT 3
GL 96-01	TESTING OF SAFETY RELATED CIRCUIT FUNCTIONS	LOGIC FUNCTIONS AS DESCRIBED IN GENERIC LETTER 96-01 WERE PERFORMED AND REPORTED BY JSPLTR #97-0115 DATED JUNE 19, 1997
JSP LETTER 96-0177	CORE SPRAY INTERNAL PIPING	EXAMINATIONS OF THE CORE SPRAY INTERNAL PIPING WERE CONDUCTED PER BWRV1P-18. RECORDS OF THE INSPECTION METHODS AND RESULTS WILL BE SUBMITTED AS PART OF THE ISI 90 DAY SUMMARY REPORT.
TECH SPEC CHANGE FOR TORUS TEMPERATURE	POST LOCA TORUS TEMPERATURE	NO SUPPORT/BUILDING ATTACHMENT MODIFICATIONS WERE IDENTIFIED AS A RESULT OF THE TORUS TEMPERATURE REVISION
IR 96/201 (ISI)	PROVIDE DISCHARGE PRESSURE INSTRUMENT CALCULATIONS TO ADDRESS ECCS INSTRUMENT UNCERTAINTIES	USING COMED METHODOLOGY, PROVIDE CALCULATIONS TO DEFINE INSTRUMENT UNCERTAINTIES ON THE DISCHARGE PRESSURE INSTRUMENTS FOR THE CS, HPCI AND LPCI PUMPS, USED TO SUPPORT IST OPERABILITY SURVEILLANCES.

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PART 21 NOTIFICATION	GE F-FRAME MOLDED CASE CIRCUIT BREAKERS, FAILURE TO TRIP	ALL SIX UNIT 3 ELECTRICAL PROTECTION ASSEMBLIES (EPA) WERE EXAMINED. ONE BREAKER WAS IDENTIFIED AS CONTAINING ACCESSORY DATE CODE "KX-239+" AS LISTED IN THE PART 21 NOTICE. THIS BREAKER WILL BE REPLACED BY WR #970048595
LER 2-96-007 LER 3-96-002	UNIT 3 HPCI STEAM SUPPLY LINE	REPLACED COMPLETE HPCI DRAIN LINE WITH CHROME-MOLY MATERIAL WHICH IS VERY RESISTANT TO FLOW ACCELERATED CORROSION AND IS DESIGNED FOR THE REMAINING LIFE OF DRESDEN UNIT #3. THIS REPLACED LINE HAS BEEN REMOVED FROM THE FLOW ACCELERATED CORROSION (FAC) INSPECTION PROGRAM AS IT IS NO LONGER SUSCEPTIBLE TO FAC.
LER 2-96-011	IST PROGRAM	1. REVISED TECHNICAL APPROACH & POSITION NUMBER TV-00B IN THE IST PROGRAM. THE REVISION ESTABLISHED A MAXIMUM LEAKAGE LIMIT ALLOWED DURING THE APPENDIX J TYPE C LEAKAGE TEST OF 56.5 SCFH. THE APPENDIX J LIMIT ENSURES THAT THE IST PROGRAM CODE REQUIREMENT OF <5 GPM IS SATISFIED. 2. COMPLETED IST PROGRAM SELF ASSESSMENT REPORT. ANY ADDITIONAL NON-COMPLIANCE ISSUES IDENTIFIED WILL BE INCLUDED ON THE SUPPLEMENTAL LER AT THE CONCLUSION OF THE ASSESSMENT 3. THE LPCI FLOW INSTRUMENTATION CALIBRATION, ASME CODE AND NUREG-1482 WERE FURTHER REVIEWED AND DETERMINED THAT A RELIEF REQUEST IS NOT REQUIRED.
LER 2-97-008	4KV BREAKER AUXILIARY SWITCHES	COMPLETED INSTALLATION OF STRAPS ON U3 4KV BREAKER SWITCHES. WR 970042481
IN 94-049	MOTOR OPERATED VALVE TORQUE SWITCHES	REPLACED TORQUE SWITCHES ON THE FOLLOWING VALVES: MO 3-1301-4 WR 950065085; MO 3-1501-22B WR 950021697; MO 3-1501-28B WR 950065624.
84-09	NITROGEN INERTING AND MAKE-UP SYSTEMS	NCAD MOD M12-3-94-003 (WR 940095888) HAS BEEN INCORPORATED DURING D3R14. TESTING IS COMPLETE. ACAD MODS M12-2-97-001 (WR 970022316) AND M12-3-97-001 (WR 970022368) HAVE BEEN INCORPORATED DURING D3R14 TO PERMANENTLY DISABLE ACAD SYSTEM.
GL 94-03	INTERGRANULAR STRESS CORROSION CRACKING OF CORE SHROUDS IN BOILING WATER REACTORS	COMPREHENSIVE SHROUD REPAIR THAT MEETS BWRVIP SHROUD REPAIR RECOMMENDATIONS WAS INSTALLED. ADDITIONALLY, CORE SHROUD EXAMINATIONS IN SUPPORT OF THE REPAIR WERE PERFORMED PER THE GUIDELINES OF BWRVIP-07. J.S. PERRY TO U.S. NRC LETTER (JSPLTR #97-0101) TRANSMITS THE FINAL INSPECTION RESULTS OF THE CORE SHROUD TO THE NRC STAFF.

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GL 96-06	THERMAL INDUCED PRESSURIZATION	THE FOLLOWING PROCEDURES WERE REVISED/CREATED: FOR RWCU PENETRATION X-113, DOP 1200-01, REVISED "RWCU SYSTEM OPERATION WITH THE REACTOR AT PRESSURE" REVISED DOP 1200-03, "RWCU SYSTEM OPERATION DURING REACTOR STARTUP AND SHUTDOWN". FOR REACTOR RECIRC SAMPLE PENETRATION X-122 CREATED DOP 0220-03, "OPERATION OF THE REACTOR RECIRCULATION SAMPLE SYSTEM TO PREVENT THERMAL OVERPRESSURIZATION OF DRYWELL PENETRATION" THE FOLLOWING PENETRATIONS WERE MODIFIED DURING THE OUTAGE TO PREVENT THERMAL PRESSURIZATION: X117 AND X118 DRYWELL EQUIPMENT DRAIN, X123 AND X124 REACTOR BUILDING CLOSED COOLING WATER, X119 DEMINERALIZED WATER, AND X111A AND X111B SHUTDOWN COOLING SYSTEM. THE STATUS OF GL 96-06 COMMITMENTS WAS REPORTED IN JSPLTR #97-0104 OF MAY 30, 1997.
LER 3-95-019	IRMS 13 & 14	IRM 14 DETECTOR WAS REPLACED
LER 3-95-019	RECIRC PUMP CONTROL	THE FEEDWATER LEVEL CONTROL MODIFICATION (LOGIC) WILL FACILITATE USE OF ITS LOGIC CIRCUITRY TO PERFORM THE INTERLOCK FUNCTION OF THE RECIRC PUMP MISMATCH INTERLOCK RELAYS. (WR #D950064442-01) INSTALLED FWLC MOD, AND SATISFACTORILY COMPLETED TESTING ON 7/7/97.
LER 3-96-004	3B FEEDWATER REGULATING VALVE	REPLACED 3B FWRV TRIM WITH CCI DRAG TRIM, PER WR #95006442-12
LER 3- 97-004	ISOLATION OF ISOLATION CONDENSER	1. GROUP V RESET COIL WAS FOUND TO BE OPEN. RELAY WAS REPLACED 2. DGP 02-03 WAS REVISED TO INCLUDE A NOTE TO EXPECT A POSSIBLE GROUP V WHEN 2(3)-1301-3 IS OPENED ON SHUTDOWN OF THE ISO CONDENSER. 3. A WALKDOWN OF THE SYSTEM, PERFORMED ON 5/23/97, OUTSIDE OF CONTAINMENT FOUND ALL PIPING AND HANGERS WERE IN GOOD CONDITION.
89-10	CORRECT SWITCH SETTINGS FOR MOVs	1. DAP 04-15 ESTABLISHED CORRECT SWITCH SETTINGS FOR MOVs. STATIC TESTS WERE PERFORMED PER THAT PROCEDURE. 2. STATIC AND DIFFERENTIAL PRESSURE TESTING OF GENERIC LETTER 89-10 MOTOR OPERATED VALVES (MOVs). ALL STATIC TESTING IS COMPLETED, DIFFERENTIAL PRESSURE TESTING OF THE 3-2301-10 AND 3-2301-14 REMAINS PLANNED FOR LATER THIS YEAR.
IR 237/93021; 249/93021	DP TESTING SCHEDULE	NOTIFIED SENIOR RESIDENT NRC INSPECTOR OF CHANGES TO THE DIFFERENTIAL PRESSURE TESTING SCHEDULE PRIOR TO REACTOR RESTART OF D3R14. THERE IS NO DP TESTING REQUIRED FOR D2R15.

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I.R.237/95001; 249/95001	SYSTEMS VULNERABLE TO FOREIGN MATERIAL INTRUSION	<p>THE FOLLOWING SYSTEMS AND COMPONENTS WERE INSPECTED FOR FOREIGN MATERIAL DURING D3R14</p> <table> <tr> <th>SYSTEM</th><th>WR #</th><th>DATE COMPLETED</th></tr> <tr> <td>CONDENSER WATER BOX</td><td>950107237-01</td><td>5/27/97</td></tr> <tr> <td>CONDENSER HOTWELL</td><td>950070271-01</td><td>5/21/97</td></tr> <tr> <td>ISOLATION CONDENSER</td><td>950055084-01</td><td>5/23/97</td></tr> <tr> <td>TORUS MISSILE SHIELDS</td><td>960093049-01</td><td>6/5/97</td></tr> <tr> <td>CIV #3</td><td>950073157-01</td><td>5/6/97</td></tr> <tr> <td>CIV #4</td><td>950090222-01</td><td>4/26/97</td></tr> <tr> <td>CIV #5</td><td>950061332-01</td><td>4/26/97</td></tr> </table>	SYSTEM	WR #	DATE COMPLETED	CONDENSER WATER BOX	950107237-01	5/27/97	CONDENSER HOTWELL	950070271-01	5/21/97	ISOLATION CONDENSER	950055084-01	5/23/97	TORUS MISSILE SHIELDS	960093049-01	6/5/97	CIV #3	950073157-01	5/6/97	CIV #4	950090222-01	4/26/97	CIV #5	950061332-01	4/26/97
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IN 95-57	AVAILABILITY OF DECAY HEAT REMOVAL SYSTEM	SHUTDOWN COOLING WAS AVAILABLE FOR ALL BUT 56 HOURS OF THE 85 DAY OUTAGE AS OF 6-10-97. WHEN SDC WASN'T AVAILABLE, THE SHUTDOWN RISK CODE REFLECTED THIS FACT.																								
GL 95-07	PRESSURE LOCKING, PRESSURE BINDING OF VALVES	DRESDEN OPERATING PROCEDURE DOP 0600-06 "FEEDWATER REGULATING VALVE (FWRV) OPERATION" HAS BEEN REVISED (REV 11, 6/12/97) TO ELIMINATE THE SUSCEPTIBILITY OF THERMAL BINDING FOR VALVES 3-3206A/B.																								
CONTAINMENT COOLING / LICENSE AMENDMENT	TORUS ATTACHED PIPING	UNIT 3, ALL PIPING AND SUPPORT CALCULATIONS WERE REVISED TO ENCOMPASS 183 DEGREE F TORUS WATER TEMPERATURE.																								
LER 2-96-018	HPCI LUBE OIL COOLER LEAK	THE UNIT 3 HPCI LUBE OIL COOLER WATER SIDE (TUBE SIDE) WAS INSPECTED DURING REFUELING OUTAGE D3R14 BY WR #960116198-01. THE INSPECTION INCLUDED A FOREIGN MATERIAL AND CLEANLINESS INSPECTION, A 70 PSIG AIR TEST OF EACH TUBE, AND AN EDDY CURRENT TEST. ALL INSPECTIONS AND TESTING WERE SATISFACTORY.																								
IR 249/96004	UNIT 3 CHECKLIST DISCREPANCIES FOLLOWING ENTRIES TO UNIT 3 INACCESSIBLE AREAS	THE REMAINING PORTIONS OF THE UNIT 3 SYSTEM CHECKLISTS FOR VALVES LOCATED IN INACCESSIBLE AREAS WERE PERFORMED. DURING THE SYSTEM CHECKLIST WALKDOWNS, NO OUT-OF-POSITION VALVES WERE DISCOVERED. DISCREPANCIES IDENTIFIED WERE MINOR IN NATURE (E.G. LABELING OR PROCEDURE).																								
GL 88-01	UNIT 3 RWCU PIPING	ALL IGSCC SUSCEPTIBLE PIPING IN THE UNIT 3 RWCU SYSTEM WAS REPLACED UNDER M12-3-91-018-A.																								
LER 3-95-008	IRM'S 14 AND 15	BOTH DETECTORS WERE REPLACED DURING D3R14 BY WR 960004852 AND 960004859.																								

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LER 3-95-019	CIRCULATING WATER SCREENS	INDIVIDUAL TRAVELING SCREEN MODULES FOR A, B, C, D, E, & F BAYS HAVE BEEN CHANGED OUT WITH A NEW COMPOSITE MATERIAL. WORK WAS PERFORMED UNDER WR 970001541-01, 02 & 03.
LER 3-95-019	CONTROL ROD DRIVE OBSERVATIONS	A WALKDOWN OF THE CRD INSTRUMENT TUBING AND PIPING WAS PERFORMED AFTER U3 SHUTDOWN FOR D3R14. THE WALKDOWN DID NOT IDENTIFY ANY LOOSE HANGERS, UNISTRUT CLIPS, OR ANY OTHER ABNORMALITIES. THEREFORE, IT IS CONCLUDED THAT THE REPAIRS PERFORMED DURING D3F20 ARE EFFECTIVE.
3-94-001	H2O2 CHECK VALVE PERFORMANCE	LLRT PERFORMED DURING D3R14 ON 3-2499-28A & 28B SHOW VALVE LEAKAGE TO BE WELL BELOW ACCEPTANCE CRITERIA.