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ComEd

December 10, 1997

JSPLTR #97-0211

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Dresden Nuclear Power Station Units 2 and 3
Restructure of a Commitment Regarding MSIV Local Leak Rate Test (LLRT) Improvement Measures
NRC Docket Nos. 50-237 and 50-249

Reference: a) J.S. Perry to USNRC Licensee Event Report (LER) 50237/93-026 Revision 0 dated November 29, 1993.

b) J.S. Perry to USNRC Licensee Event Report (LER) 50237/95-015 Revision 1 dated May 15, 1996

The purpose of this letter is to inform the Staff of a restructure to ComEd's program for maintaining sustained improvement in the as-found 10CFR50 Appendix J, Local Leak Rate Tests (LLRT) of the Main Steam Isolation Valves (MSIV). Within Reference a), ComEd committed to repair/replace the main valve seat ring and lower guide liner for a minimum of two MSIVs each refueling outage until all were replaced. To implement this, ComEd designed a liner upgrade modification which included replacement of the seat ring and lower guide liner. ComEd has performed the committed maintenance for four MSIVs on each Unit. Also, the internals of two additional MSIVs on Unit 2 were replaced prior to the design of the upgrade.

ComEd's recent evaluation of the LLRT results for the valves that have not been upgraded to-date and the results of the maintenance performed, combined with new technology for examining MSIV main seat degradation, has led to the determination that implementation of the upgrade modification is not the optimum solution to insure sustained improvement. ComEd has determined, based on work performed, current LLRT results, the use of acid etching (improved inspection technique) of the main valve seating surface and improved maintenance techniques that a change to the current MSIV LLRT improvement efforts was necessary. ComEd has seen significant improvement in overall MSIV LLRT performance by focusing its efforts

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on maintaining a quality seating surface of the main valve and subsequently upgrading with a new lower guide liner, if the main valve seating surface needs replacement.

In accordance with Reference a), ComEd had scheduled to replace the lower guide liners and main valve seats for the 2B and 2D MSIVs during the upcoming 15th refueling outage which is scheduled to start on March 7, 1998. However, proceeding with a full liner replacement when the as-found LLRT results are acceptable will result in significant expense without the corresponding equivalent improvement to safety.

Based on past LLRT history of the valves that have yet to receive a liner upgrade, ComEd is taking a performance based approached with respect to continued upgrade of the MSIVs. This approach would include, but not be limited to, inspection of the seating surfaces upon failure of an MSIV to pass the LLRT. If the main seating surface requires replacement, the liner upgrade will be installed since an upgraded lower guide liner will add to the life expectancy of the seating surface.

ComEd is prepared to upgrade 2 MSIVs on a contingency basis as described above. ComEd can provide the LLRT results and a summary of the evaluation that led to the restructuring of the liner replacement commitments made in References a) and b) at your request. Please direct any questions concerning this matter to Frank Spangenberg of my staff at (815) 942-2920 extension 3800.

Sincerely,

J. Stephen Perry
Site Vice President
Dresden Station

cc: A. Bill Beach, Regional Administrator, Region III
J.F. Stang, Project Manager, NRR (Unit 2/3)
K. Riemer, NRC Senior Resident Inspector - Dresden
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