



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

EVALUATION OF RELIEF REQUEST FROM THE IMPLEMENTATION
OF 10 CFR 50.55a REQUIREMENTS RELATED TO THE REPAIR
AND REPLACEMENT ACTIVITIES FOR CONTAINMENT
COMMONWEALTH EDISON COMPANY
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

By *Federal Register* Notice dated August 8, 1996, the Nuclear Regulatory Commission amended its regulations (rule) to incorporate by reference the 1992 Edition with the 1992 Addenda of Subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code). Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of Class CC (concrete containments), and Class MC (metallic containments) of the light-water cooled power plants. The effective date for the amended rule was September 9, 1996, and it requires the licensees to incorporate the new requirements into their ISI plans and to complete the first containment inspection within 5 years, that is, by September 9, 2001. Since the amended rule became effective on September 9, 1996, any repair or replacement activity to be performed for the containments after that date has to be in accordance with the respective requirements of Subsection IWE (IWL is not applicable to Dresden Station). However, a licensee can submit a request for relief for the date of implementation of its containment repair and replacement (R/R) activities with proper justification. The provision for granting relief is incorporated in the regulation.

Pursuant to 10 CFR 50.55a(a)(3)(ii), Commonwealth Edison Company (ComEd, the licensee) submitted relief request MCR-01 requesting NRC to grant relief from the immediate implementation of the requirements of the ASME Code, Section XI, 1992 Edition with the 1992 Addenda, Articles IWA-4000 and IWE-4000 of Subsections IWA and IWE related to the containment R/R activities (Reference 1). The relief was requested until December 31, 1997. This evaluation addresses the merits of the relief requests for Dresden Station, Units 2 and 3.

2.0 EVALUATION

The relief request is based on the licensee's justification that immediate compliance with the requirements of the rule for R/R activities would result in unusual difficulty without a compensating increase in the level of safety and quality. In Reference 1, the licensee provides a number of reasons, such as reclassification of components to Class MC (from the original 1965 classification as Class B) classification criteria, revisions to existing procedures for R/R

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activities to incorporate the requirements of Subsections IWE and IWA, and incorporation of appropriate examiner training and qualification requirements in the ComEd procedures, to demonstrate the impracticality of meeting the requirements of the rule for R/R activities.

Reference 1, however, did not provide any assurance regarding the adequacy of the present containment R/R program. In response to the staff's request for additional information, the licensee clarified and provided a summary description of the alternative that is used for the containment R/R activities, and revised the relief request dates from December 31, 1997, to September 9, 1997 (Reference 2). Until September 9, 1997, all R/R conducted on Class MC components and their integral supports will be performed in accordance with the existing Dresden Station site specific requirements and the ComEd quality assurance (QA) program. The ComEd QA program is governed by the quality assurance criteria of Appendix B of 10 CFR Part 50. The staff considers the alternative program for R/R activities reasonable and acceptable during the period of relief.

Also, the staff concludes that immediate compliance with the requirements of the amended rule during the period September 9, 1996, through September 8, 1997, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. The licensee will implement the requirements of the amended rule for the containment R/R activities starting September 9, 1997.

3.0 CONCLUSION

Based on the review of the information provided in the relief request (MCR-01) and the response to the staff's request for additional information, the staff finds the temporary use of the current procedure for containment repair and replacement activities, instead of the requirements of the amended 10 CFR 50.55a rule, to be reasonable and acceptable. Also, the staff concludes that immediate compliance with the requirements of the amended rule for containment repair and replacement activities during the period September 9, 1996, through September 8, 1997, would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety. Accordingly, the request for relief dated April 10, 1997 (as supplemented on September 11, 1997), to delay implementation of the rule for repair and replacement activities until September 8, 1997, is acceptable for authorization pursuant to 10 CFR 50.55a(a)(3)(ii).

Principle Contributor: H. Ashar

Dated: March 23, 1998

4.0 References

1. Letter from John Hosmer (ComEd) to NRC, "Relief Requests from ASME Section XI, 1992 Edition with the 1992 Addenda, Article IWE-4000," dated April 10, 1997.
2. Letter from John Hosmer (ComEd) to NRC, "Response to Request for Additional Information," dated September 11, 1997.