

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



May 16, 1998

JMHLTR: #98-0135

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 15 (D2R15)  
NRC Docket No 50-237

The purpose of this letter is to provide an update of significant accomplishments made at Dresden Station during the spring 1998 Unit 2 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 2 in April 1998 during which many outstanding safety, materiel condition, and regulatory issues were addressed. The more significant accomplishments during D2R15 are listed below:

- Replaced Emergency Core Cooling Systems (ECCS) suction strainers with improved design.
- Replaced a very large quantity of missing or damaged insulation in the drywell.
- Upgraded the Feedwater Level Control System to 3-element control.
- Replaced two degraded drywell coolers.
- Repaired the partition plate of the 2A Low Pressure Coolant Injection (LPCI) Heat Exchanger.
- Repaired the High Pressure Coolant Injection (HPCI) 2-2301-3 valve.
- Replaced 60 degraded Control Rod Drives (CRD)

9805220101 980516  
PDR ADDCK 0500237  
P PDR

1/1  
A001

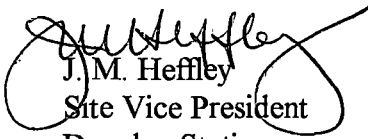
- Performed surveillance/repair of several hundred CRD Hydraulic Control Unit (HCU) valves.
- Replaced 24/48 vdc batteries and chargers.
- Replaced 36 defective SBM switches requiring an outage to repair.
- Repaired two leaking Reactor Feed Pump discharge check valves
- Replaced 24 degraded vertical extraction steam bellows in the main condenser.
- Relined the E, F, and G Condensate Demineralizer Service Units.

As a result of Confirmatory Action Letter (CAL) RIII-90-001 and LER 2-90-02 supplement 2, a commitment was made to install a modification to prevent a failure of the main generator output breakers to open automatically on reverse power. This modification was installed during D2R15 but failed the functional test and was not placed in service. During D2R16, a new voltage regulator will be installed with internal circuitry to ensure the operation of the reverse power trip without external components.

The 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.M. Heffley  
Site Vice President  
Dresden Station

cc: A. B. Beach, Regional Administrator -- RIII  
L. Rossbach Project Manager - NRR  
K. Riemer, Senior Resident Inspector, Dresden Station  
Office of Nuclear Safety - IDNS

**ATTACHMENT A**  
**SUMMARY OF D2R15 OUTAGE WORK ON REGULATORY RELATED ITEMS**

References	Subject	Discussion
IR 237/249/96201	Unit 2 Local Leak Rate Testing (LLRT) issues.	Block valve & test taps were installed inside drywell inboard of PCIV 2-2001-5, 2-4720, 2-8501-3A, 2-1501-19A, 2-1501-19B, 2-4722, and 2-2001-105. Valve 2-0399-587 was added outboard of the current outboard PCIV 2-0399-506. These valves will be tested in the accident direction as required by 10CFR50 Appendix J Option B in all future Unit 2 outages.
IR 237/249/96201	2A Core Spray Pump Vibration	A volute trim was performed on this pump, but the vibration at minimum flow were not reduced as they were in the other Core Spray pumps. It was possible to increase the impeller to volute gap to only 9% of the impeller diameter because further metal removal from the volute would challenge the structural integrity of the casing. Vibration at minimum flow is being monitored.
IEB 96-03	ECCS Suction Strainers	Installed newly designed torus suction strainer to meet IEB 96-03. However, NRC approval of Boiling Water Reactors Owners Group (BWROG) methodologies to size those strainers is still pending.
IEN 89-64	Inspection of 4KV buses	Inspected Bus 40 during D2R15 in accordance with IEN 89-64 per WR 960018041
IEN 94-10	Change the motor pinion Key of all MOV actuators to AISI 4140 material	Motor Operated valve (MOV) 2-2301-3 had the key changed to S.I. #504A22 per WR# 960086109-02
GL 96-05	MOV Stem Lube Degradation	As found VOTES testing was performed satisfactorily on selected valves
J. F. Stang (NRC) letter transmitting "Dresden Nuclear Power Station, Unit 2 - Evaluation of Core Spray Piping Indications (TAC No. 93590)," dated February 23, 1996	Core Spray Piping Re-Inspection	Flow evaluation for core spray piping internal to the Unit 2 Reactor was provided to the NRC by JMHLTR #98-0114 of 4/11/98.
J. Hosmer ltr dated September 4, 1996	Reactor Water Clean Up (RWCU) High Energy Line Break (HELB) auto-isolation modification	Completed Work In Main Control Room Panel 902-4. Additional work needed to complete isolation function will be conducted following the outage.
LER 2-93-04	Main Steam Line (MSL) Tunnel Area Temperature Switches	Completed Replacement Of Switches per WR 940094891-01.

**ATTACHMENT A**  
**SUMMARY OF D2R15 OUTAGE WORK ON REGULATORY RELATED ITEMS**

<b>References</b>	<b>Subject</b>	<b>Discussion</b>
LER 2-93-23 S-02	MOV 2-2301-03 Valve Seats	MOV 2-2301-3 valve seats and disc were completely replaced per WR 960086109-01
LER 2-95-021 S-02	Secondary Containment Bypass Leakage Through The Control Rod Drive Hydraulic Control Units (HCU)	The fourth and final modification was installed per Exempt Change E12-2-96-231 to install check valve in the Control Rod Drive header to prevent backflow.
LER 2-96-02	Valve Pressure Binding	MOV 2301-8 was rebuilt and the valve disc was drilled out under WR 920053722-01.
LER 2-96-11 S-01	Testing Of Valve 2-2301-29	VALVE 2-2301-29 was leakage tested satisfactorily per WR 970067893-01
LER 2-97-03 S-01	Penetration Overpressurization	Completed modifications to penetrations as described in JSPLTR: #97-0104 May 30, 1997. These modifications complete changes needed to meet GL 96-06.
LER 2-97-12	Install Banana jacks	Banana jacks were installed at the terminal points required for surveillance per WR 970024597-01.
LER 2-98-04	Main Steam Isolation Valve (MSIV) leakage	Disassembled and inspected outboard B MSIV PER WR 960007478 and outboard D MSIV per WR 960007477. As left LLRT satisfactory and within tech spec requirements.
LER 3-98-01	High Pressure Coolant Injection (HPCI) Gland Seal Leakoff (GSLO) Level Control System.	THE U2 GSLO Condenser Level Control System will be tested and inspected, similar to the testing and inspections performed on unit 3 following the reportable event completed WR 970056742-01; 980020312-01
LER 2-95-18 S-01	D2 Shear Lug Inspection Hatch Double Gasket Seal	The double gasket seal failed the initial leak rate test. It was determined that the gasket had reached the end of its service life and was replaced. The as left LLRT was performed which yielded a leakage of 0.00 SCFH. Shear lug hatch #8 will be retested during D2R16 as required by 10CFR50 Appendix J.
LER 2-96-02	MSL Drain Bypass Line Orifice Plate	Temporary alteration removed and permanent repair completed under WR 960041660-02.
LER 2-96-07	HPCI Steam Supply Drain Line	Replaced HPCI drain pot line with Flow Accelerated Corrosion (FAC) resistant material; A335 P11. Work was completed per WR #960095100-01, 02 AND 03.
LER 2-96-15	Inspection & Repair Of Valve 2-2301-8 And Check Valve 2-2301-7 To Confirm/Repair Cause Of Backleakage	MOV 2-2301-8 seats and valve disc were repaired on WR 920053722-01. The seats had indications of leakage. The seats and Disc were repaired and satisfactorily blue checked. Check Valve 2-2301-7 satisfactorily passed the Inservice Test (IST) seat leakage test per DTS 0040-07. However, the 2-2301-7 Valve failed its manual full stroke operability test (DOS 2300-04) and was internally inspected per DAP 11-25 per WR 960091325-01. The seating surfaces were satisfactorily inspected and the hinge pins and bushings cleaned. Following valve reassembly, the valve was satisfactorily leak tested a second time per DTS 0040-07.

**ATTACHMENT A**  
**SUMMARY OF D2R15 OUTAGE WORK ON REGULATORY RELATED ITEMS**

References	Subject	Discussion
LER 2-96-18	HPCI Lube Oil Heat Exchanger	The unit 2 HPCI Lube Oil Cooler was eddy current tested per WR 970043298. The eddy current test revealed indications of degradation in 11 tubes which were replaced, along with the 4 that were plugged in November, 1996. An additional tube that was free of eddy current indications was removed for analysis and a new tube installed. A total of 16 tubes were replaced, no tubes are currently plugged. The lube oil cooler was pressure tested satisfactory.
LER 2-98-01	Reactor Building Post Loss of Coolant Accident (LOCA) Temperatures	The thermal overloads for the most critical loads were reset to compensate for the higher ambient temperatures expected in the Reactor Building following a LOCA.
LER 3-98-03	Scram Due To MSIV Closure	From D3 scram investigation, (1) Burnish 595-103D relay contacts (WR 980037567); (2) Perform DIS 250-1 MSL HI Flow surveillance (WR 980018684).