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July 24, 1998

JMHLTR: #98-0207

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
  - c) J.S. Perry (ComEd) to USNRC letter dated December 10, 1997.

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 commitment, 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, led to the determination that implementation of the upgrade modification is not the optimum solution to insure sustained improvement. ComEd 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

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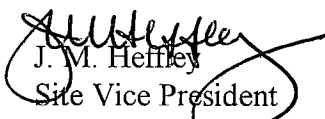
improvement in overall MSIV LLRT performance by focusing efforts on maintaining a quality seating surface of the main valve and subsequently upgrading with a new lower guide liner, if the main valve seating surface needs replacement.

In accordance with Reference (a), ComEd had scheduled to replace, on a contingency basis, the lower guide liners and main valve seats for the 1B and 2D MSIVs during the upcoming 15th refueling outage for Unit 3(D3R15), which is scheduled to start on January 30, 1999. 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. ComEd provided a similar notification of commitment restructure for Unit 2 in Reference (c). Based on D2R15 as-found LLRT results of the 2B and 2D MSIVs, disk and seating surface maintenance was performed. Since the main seat did not require replacement, the new liners were not installed on either valve.

Based on past LLRT history of the Unit 3 valves that have yet to receive a liner upgrade, ComEd is taking a performance based approach 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 two 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. M. Henley  
Site Vice President  
Dresden Station

cc: C. Paperiello, Acting, Regional Administrator, Region III  
L.W. Rossbach, Dresden Project Manager, NRR (Unit 2/3)  
K. Riemer, NRC Senior Resident Inspector - Dresden  
Illinois Department of Nuclear Safety