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U.S. Nuclear Regulatory Commission
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Dresden Nuclear Power Station, Unit 2 and Unit 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Change in Commitment for Feedwater Nozzle Inspections

- References:
- 1) Letter from R. F. Janacek (ComEd) to D. G. Eisenhut (USNRC), Dresden Station Units 2 and 3; Quad Cities Units 1 and 2; Implementation of NUREG-0619," dated February 23, 1981
 - 2) Letter from R. A. Pinelli (BWROG) to USNRC "Alternate BWR Feedwater Nozzle Inspection Requirements," dated October 30, 1995
 - 3) USNRC Safety Evaluation, "BWROG-Safety Evaluation of Proposed Alternative to BWR Feedwater Nozzle Inspections (TAC M94090)", dated June 5, 1998

The purpose of this letter is to revise a previous commitment from Commonwealth Edison (ComEd) Company at the Dresden Nuclear Power Station. We have elected to perform future feedwater nozzle inspections in accordance with the Boiling Water Reactor Owners' Group (BWROG) GE-NE-523-A71-0594 "Alternate BWR Feedwater Nozzle Inspection Requirements," Reference 2, for the Dresden Nuclear Power Station Units 2 and 3. This is a change to those originally imposed under NUREG-0619, "BWR Feedwater Nozzle and Control Rod Driven Return Line Nozzle Cracking." In Reference 1, we originally committed to perform various inspection requirements identified in that NUREG. We also elected, in the early 1980s, to correct the cause of the leakage and resultant cyclic thermal fatigue nozzle cracking by removing the feedwater nozzle bore cladding and installing the current state-of-the-art triple sleeve, double piston ring feedwater spargers.

Since NUREG-0619 was instituted, the industry has developed ultrasonic inspection technologies and inspection criteria that are capable of detecting the cracking concerns originally identified. This inspection method can be utilized to assure the integrity of feedwater nozzles without disassembly of the nozzle components. As a result, the BWR Owners Group (BWROG) proposed that ultrasonic inspections replace the liquid

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April 30, 1999

U.S. Nuclear Regulatory Commission
Page 2

penetrant inspections imposed in Table 1 of NUREG-0619 and that the UT inspection intervals be based on sparger-sleeve configuration and inspection method (see Table 6-1 in Reference 2). In Reference 3, the NRC issued a Safety Evaluation (SE) that conditionally approved this approach. Dresden Nuclear Power Station has reviewed the six conditions imposed in Section 5 of the SE and will implement them as applicable.

The SE required that proposed alternate ultrasonic inspections be performed in accordance with criteria established in Appendix VIII, "Performance Demonstration for Ultrasonic Examination Systems," of the ASME Boiler and Pressure Vessel Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components." During the previous refueling outages for Units 2 and 3 (D2R15 and D3R15), General Electric performed an automated inspection of the feedwater nozzles. The objectives of the ASME Code Section XI Appendix VIII criteria were met by in the performance of these examinations. The inspection utilized the GERIS 2000 system. This system is an automated, full RF recording with no recording threshold. The technique had the ability to detect flaws equal to 0.250 inches in depth. As a result, we intend to utilize the Feedwater Nozzle/Sparger Inspection Recommendations contained in Table 6-1 of Reference 2 for a triple sleeve, double piston ring, unclad nozzle at the Dresden Nuclear Power Station Units 2 and 3 with the inspection interval to begin with the previous refueling outages, D2R15 and D3R15.

Should you have any questions concerning this letter, please contact Mr. Dale Ambler, Dresden Station Regulatory Assurance Manager, at (815) 942-2920, ext. 3800.

Respectfully,


J.M. Heffley
Site Vice President
Dresden Nuclear Power Station

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station