

September 9, 1999

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: DRESDEN, UNITS 2 AND 3 - REQUEST FOR ADDITIONAL INFORMATION
ABOUT CHEMISTRY TECHNICAL SPECIFICATION AMENDMENT REQUEST
FOR (TAC NOS. MA5415 AND MA5416)

Dear Mr. Kingsley:

During our review of your license amendment request dated May 3, 1999, which would relocate chemistry technical specifications (TS) from TS to licensee controlled documents, we have identified the need for additional information. The questions in the enclosed request for additional information (RAI) were discussed with your staff on September 8 and 9, 1999. It was agreed that the response would be provided by September 14, 1999, so that this amendment may be issued to support the beginning of refueling outage D2R16.

Sincerely,

Original signed by:
Lawrence W. Rossbach, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure: RAI

cc w/encl: See next page

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

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Sincerely,

A handwritten signature in cursive script, appearing to read "Lawrence W. Rossbach".

Lawrence W. Rossbach, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure: RAI

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O. Kingsley
Commonwealth Edison Company

cc:

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Units 2 and 3

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REQUEST FOR ADDITIONAL INFORMATION
RELATED TO CHEMISTRY TECHNICAL SPECIFICATION
AMENDMENT REQUEST
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

Background and Basis for RAI: In the application of noble metal chemical addition (NMCA), the reactor coolant water chemistry, including conductivity, is expected to change and has the potential to exceed current Technical Specification (TS) limits. Extensive intergranular stress-corrosion cracking (IGSCC) has been found in many boiling water reactors (BWRs), including Dresden. The extent of IGSCC in BWRs depends greatly on the water chemistry of the reactor coolant. To ensure the structural integrity of the components degraded by IGSCC, certain limiting water chemistry conditions such as conductivity and chloride and sulfate content are required to be met in order to support the use of the assumed crack growth rates in the plant specific flaw evaluations. The proposed TS amendment would relocate reactor coolant water chemistry TS requirements to licensee controlled documents. Since these TS have been part of the basis used to justify operation with IGSCC, we have several questions about the chemistry controls that will be in place after the chemistry TS are relocated.

Questions

- (1) Describe, in detail, what programs will be in place to monitor and control water chemistry during the NMCA process. Include a description of the monitoring and controls that will be in place during the NMCA process for ionic species such as chloride, sulphate, and others that would accelerate IGSCC.
- (2) Describe, in detail, what programs will be in place to monitor and control water chemistry during normal operations. Include a description of the monitoring and controls to ensure the chemistry environment is consistent with that used to generate the data for crack growth rates.

ENCLOSURE