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June 16, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Request for Extension of Mark I
Containment Program Completion Date
NRC Docket No. 50-237

- References (a): T. A. Ippolito letter to J. S. Abel
dated January 13, 1981.
- (b): D. M. Vassallo letter to L. DelGeorge
dated January 19, 1982.
- (c): B. Rybak letter to H. R. Denton
dated June 13, 1983.

Dear Mr. Denton:

The subject letters contained NRC Orders and extension of exemptions for the Mark I containment work. These Orders provided specific exemptions and schedular extensions to comply with General Design Criterion 50 of Appendix A to 10 CFR Part 50. The schedule as noted in reference (b) for Dresden Station Unit 2 is to complete all work by July 1, 1983.

At this time we have found that we cannot complete this work by the required date. All the remaining work, except for the ECCS Suction Header Snubbers, will be completed within 90 days of the committed date; that is by September 28, 1983. The ECCS Suction Header Snubbers can be performed within 90 days but requires a Technical Specification amendment request, submitted per reference (c), to be approved prior to the work being performed. This Technical Specification amendment would allow for the snubber work to be performed while the unit is in operation. Otherwise, the work would have to be delayed until the Fall, 1984 outage.

The Attachment to this letter provides a description of the remaining work, its current status and reasons why it could not be completed by June 30, 1983.

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H. R. Denton

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June 16, 1983

If you have any questions concerning this matter, please contact this office.

One (1) signed original and forty (40) copies of this transmittal and the attachment are enclosed for your use.

Very truly yours,



B. Rybak
Nuclear Licensing Administrator

lm

Attachment

cc: R. Bevan - NRR
R. Gilbert - NRR
NRC Resident Inspector - Dresden

6752N

ATTACHMENT - A

REMAINING MODIFICATIONS

AT DRESDEN UNIT 2

VACUUM BREAKER HEADER SUPPORTS

Loads in the vacuum breaker headers are caused primarily by the movement of the torus shell during SRV and LOCA-related load events. This load transfer occurs because the supports for the headers are attached to the torus shell. Therefore, it was not possible to complete the vacuum breaker header support analysis until all of the torus motions were obtained from the torus analysis. Once the torus motions were complete the analysis of the vacuum breaker headers was performed and the required supports were designed.

Design drawings for the supports were issued in May, 1983 and are currently undergoing revisions to accommodate field interference problems. It is estimated that resolution of the field interference problems will be complete by June 15, 1983.

The modification consists of 18 supports made from tube steel and plate and should be easily installed. Therefore, it is anticipated completion within ninety (90) days of the original order date.

SUPPRESSION CHAMBER SADDLE EXTENSION PLATES

The saddle extension plates reduce the stresses in the suppression chamber shell at the structural discontinuity between the shell and the support saddle during SRV and LOCA-related loading events.

Installation of this modification was delayed due to the complicated welding procedures required for welding onto a "water-backed" torus. These procedures have now been qualified and are being approved for use. Installation of these plates should begin in mid-June. It is estimated that installation of this modification will be complete within ninety (90) days of the Order Date.

ESSC SUCTION HEADER AXIAL SNUBBERS

The twelve, 35-kip axial snubbers on the ECCS suction header will be installed within ninety (90) days after Technical Specification amendment approval to allow installation during unit operation. These snubbers attenuate Mark I loads. This delay is caused by:

- 1) material delivery delay of the snubber end brackets,
- 2) qualification of a water-backed welding procedure to affix shear lugs on the header adjacent to pipe clamps, and

- 3) technical specification revision to permit removal of the existing 20-kip snubbers during normal plant operation.

The NUTECH drawings of the 35-kip snubbers were issued prior to the 1983 refueling outage. However, the drawings were revised and reissued to add the shear lugs in late April, 1983.

As mentioned above, the ninety (90) day construction period should be sufficient as demonstrated by similar welding procedures being approved and qualified in this time frame. Materials are expected to be delivered in late June, 1983.

TORUS PIPE PENTRATION REINFORCEMENT

Five (5) torus penetrations are in the process of being reinforced with "spiders", which consist of a sleeve, four reinforcement arms and pad plates welded to the torus shell. Due to the extensive amount of welding, it is anticipated that these modifications will be completed within ninety (90) days after the Order Date. Four additional penetration reinforcements have already been completed.

PIPE SUPPORTS

The remaining eleven (11) pipe supports out of a total of 132 will be installed within ninety (90) days after the Order Date. These supports consist of base plates with multiple expansion anchor bolts, auxiliary support steel, and integral pipe attachments.

Due to the resolution of interferences of hidden concrete rebar with new expansion anchor bolt holes, construction delays were encountered. In addition, welding of structural steel hanger components has taken longer than expected in these high temperature/high radiation areas.