



Commonwealth Edison
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DAB

April 11, 1985

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Mr. James G. Keppler
 Regional Administrator
 U.S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Subject: Dresden Station Unit 2
 Main Steam Line Snubber
 Investigation
NRC Docket No. 50-237

Dear Mr. Keppler:

During the initial investigation of the cause of the Main Steam Line (MSL) snubber failures at Dresden Station Unit 2, Commonwealth Edison initiated a series of steps to determine the cause of the failures and to prevent recurrence. As the investigation progressed three additional steps were requested by the NRC, all centering around the as-built configuration of the hangers and auxiliary steel. Specifically, the issues were 1) an as-built walkdown of the MSL and SRV lines at Dresden Unit 2, (2) a commitment to perform a similar inspection of some Mark I hangers at another CECO unit, and (3) our future plans regarding as-built verification for new hangers and auxiliary steel at all our operating plants. This letter addresses all three issues.

First, a number of supports were inspected to verify, among other things, the as-built configuration. Attachment A addresses 34 of these supports, all of which deal with the Mark I project. Our conclusion for the Mark I supports is, based on their as-built configuration, that all these supports met code allowable stress values.

Second, in response to your request to inspect hangers and auxiliary steel components designed by Sargent and Lundy under the Mark I Torus Program at another CECO unit, we plan to do that inspection at Quad Cities Unit 2 during its current refueling outage. The inspection will be performed using the checklists and acceptance criteria generated for the Dresden Unit 2 inspection. The scope of work will be 15-20 hangers, each chosen on the basis of accessibility, ALARA concerns, safety margin and configurational sensitivity. The results of our inspection will be summarized and made available to the NRC upon completion of the inspection.

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J. G. Keppler

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Finally, Commonwealth Edison has embarked on a program to establish as-built dimensional verification for all safety-related piping and piping supports. It is our intent to proceed with this program in a timely manner. However, such a program will require revision to both existing Company and A-E procedures and practices and therefore, no schedule has yet been developed for implementation.

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

Very truly yours,



B. Rybak
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - Dresden

Attachment

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ATTACHMENT A

MARK I COMPONENT SUPPORT VERIFICATION

The enclosed summary indicates that state of stress of the mechanical component supports constructed in connection with the Mark I effort in 1980 or later. Column 1 lists all these supports and organizes them into groups having similar geometric configurations. For each group, the support with the highest stress level is shown in column 2. For each of these supports, the stress margins for critical members or sections are shown in column 3. The stress margin is defined as the actual interaction coefficient divided by the allowable interaction coefficient and is a factor of safety against code allowables. As long as the margin is 1.0 or less, the component support is within code allowable stresses.

Column 4 provides a margin based on the as-built configurations which were recently determined. In both columns 3 and 4, the critical member is identified by an item number which refers to the item number on the bill of material given on the support drawing. The critical load combination is also indicated by SSE or OBE. It identifies whether the load combinations include the SSE or OBE earthquake load. In column 5 the reason for the change in margin from original design to as-built configuration is identified.

Dresden 2
 Mechanical Component Support
Verification Checklist Summary

Summary of the March 1985 field verification of 34 supports installed after 1980
 in connection with the Mark I effort (installed after NRC 79-14 Bulletin issued.)

<u>Support Numbers in Group</u>	<u>Support Number of Worst Case</u>	<u>Critical Original Margin</u>	<u>As-Built Margin</u>	<u>Description of the Discrepancy Responsible for the Change in the Margin</u>
M-564E-1 M-564F-1* M-564G-2* M-564G-8 M-564H-2* M-564H-9	M564E-1	0.98 (Item 9) 0.97 (Item 3) 0.75 (Weld between Items 2 & 3) (SSE)	0.67 (Item 9) 0.71 (Item 3) 0.82 (Weld between Items 2 & 3) (SSE)	New critical member due to angular deviation
M564F-13 M564F-14 M564H-8	M564H-8	0.99 (Item 3) (SSE) 0.19 (Item 4) (SSE)	0.88 (Item 3) (OBE) 0.19 (Item 4) (SSE)	Load reduction - negligible deviations
M564E-6	M564E-6	0.64 (Item 2) 0.61 (Weld, Item 2) (SSE)	1.0 (Item 2) 0.74 (Weld, Item 2) (SSE)	Attachment location and angular deviation
M564E-4 M564E-5 M564E-11	M564E-4	0.75 (Item 2) 0.21 (Item 4) (SSE)	0.53 (Item 2) 0.90 (Item 4) (SSE)	Angular deviation (Item 4) Plate thickness (Item 2)
M564E-2 M564G-1* M564F-2* M564H-1*	M564E-2	0.68 (Item 4) (OBE)	0.68 (Item 4) (OBE)	(Note: These supports are all snubbers attached to I.P. Steel - the only auxiliary steel is stiffeners & plates)
M564E-17 M564E-20 M564F-20 M564G-20 M564H-19	M564E-17	0.68 (Item 1) (SSE)	0.26 (Item 1) (SSE)	Load decrease and plate length increase

<u>Support Numbers in Group</u>	<u>Support Number of Worst Case</u>	<u>Critical Original Margin</u>	<u>As-Built Margin</u>	<u>Description of the Discrepancy Responsible for the Change in the Margin</u>
M564E-18 M564E-19 M564F-19 M564G-19 M564H-20	M564E-18	0.72 (Item 1) (OBE)	0.91 (Item 1) (OBE)	Plate length decrease
M564E-3 M564E-7 M564E-10 M564F-3* M564G-3* M564G-9 M564H-3*	M564G-9	0.73 (Item 2) (SSE)	0.73 (Item 2) (SSE)	Note: These supports are all snubbers attached to I. P. steel - the only auxiliary steel is stiffeners.)

- Notes: 1. "Margin" is defined as the actual interaction coefficient divided by the the allowable interaction coefficient and is a factor of safety against code allowables.
2. *Indicates support wherein PSA-10 is presently being changed out to PSA-35.