



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

August 26, 1985

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

Subject: Dresden Station Unit 3
 Request for Scheduling Exemption
 from 10 CFR 50, Appendix J, Type
 B and C Test Interval
NRC Docket No. 50-249

Dear Mr. Denton:

Pursuant to 10 CFR 50.12(a), Commonwealth Edison requests a scheduling exemption for Dresden Unit 3 from the two year test interval for Type B and C leak rate tests required by 10-CFR 50, Appendix J, Sections III.D.2(a) and III.D.3. The exemption is requested on a one time only basis to support our current refueling outage schedule and avoid a forced reactor shutdown.

Dresden Unit 3 shutdown for its end of cycle 8 refueling outage on September 30, 1983. Type B and C local leak rate testing commenced on September 30 and continued through March of 1984. As a result of damage to the High Pressure Turbine rotor during initial startup attempts in the Spring of 1984, the outage was extended by approximately 4 months with startup finally occurring on July 24, 1984.

Dresden 3 was originally scheduled to shutdown for the end of cycle 9 refueling outage in the Spring of 1985. This would have allowed ample time to complete the local leak rate testing within the 2 year Appendix J interval. However, due to the unanticipated outage extension in 1984 and other considerations, the shutdown for refueling has been delayed to October 26, 1985. Maintaining this schedule will result in exceeding the two year test interval.

We therefore request a 30 day extension to the two year Appendix J test interval for the components identified in Attachment 1. The 30 day period will allow us to reach cold shutdown within our current schedule. As stated in our Technical Specifications, primary containment integrity and compliance with allowable local leakage rates is not required when in the cold shutdown condition. We interpret this to mean that formal exemption approval is not required for components subject to Type B and C tests which exceed the allowable test interval at a time when the reactor is in cold shutdown providing they are tested prior to reactor re-start.

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August 26, 1985

Your approval of the 30 day extension will allow us to complete all local leak rate testing on a schedule which incorporates the impact of our scheduled recirculation pipe replacement on normal outage activities. Local leak rate testing is currently scheduled for completion by early February, 1986.

A list of components requiring the 30 day extension and the dates of their last tests is provided in Attachment 1. Attachment 2 contains our justification for the exemption in accordance with the guidance in 10 CFR 50.12a.

In accordance with 10CFR170, a fee remittance in the amount of \$150.00 is enclosed.

Your approval is required by September 30, 1985 to avoid a forced reactor shutdown. Please direct any questions you may have regarding this matter to this office.

One signed original and ten (10) copies of this transmittal are provided for your use.

Very truly yours,



J. R. Wojnarowski
Nuclear Licensing Administrator

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Attachments

cc: R. Gilbert - NRR
Dresden Resident Inspector

0532K

ATTACHMENT 1

COMPONENT LIST REQUIRING EXTENSION OF
2-YEAR TYPE B OR C TEST INTERVAL

<u>Component</u>	<u>Description</u>	<u>Date Tested</u>	<u>Category</u>
Drywell Electrical Penetrations	-----	10/18/83	A1
1301-1 and 2	ISO-Condensor Valves	10/07/83	A1
1301-17 and 20	ISO-Condensor Vent	10/07/83	A1
1501-22B, 26B, 1001-5B	LPCI Valve	10/05/83	A1
1601-57, 58, 59	N2 Make-up	10/21/83	A1
220-57A and 58A	Feedwater Check Valve	10/08/83	A2
220-57B and 58B	Feedwater Check Valve	10/31/83	A2
220-57B and 62B	Feedwater Check Valve	10/31/83	A2
203-1A and 2A	MSIV	10/06/83	A2
203-1B and 2B	MSIV	10/06/83	A2
203-1C and 2C	MSIV	10/06/83	A2
203-1D and 2D	MSIV	10/06/83	A2
Shear Lug Hatches	-----	10/18/83	A3
Drywell Head Manhole	-----	10/01/83	A3
1601-23, 24, 60, 61, 62, 63	D/W and Torus Vent	10/16/83	B
2301-34 and 71	HPCI Drain	10/10/83	B
2301-45 and 74	HPCI Exhaust	10/10/83	B
2001-5 and 6	D/W Sump	10/02/83	C
2001-105 and 106	D/W Sump	10/02/83	C

CATEGORIES

A - Cannot be tested during power operation because:

1. Pressure on system prevents proper venting
2. Affected system cannot be isolated during operation
3. Component is in drywell (inerted) or inaccessible during operation

B - Testing during power operation would require system out-of-service thereby entering Technical Specification LCO Action statement (potentially requiring shutdown).

C - Tests can be done during power operation but exposes workers to high dose rates and contamination

ATTACHMENT 2

JUSTIFICATION FOR SCHEDULAR EXEMPTION FROM

10 CFR 50, APPENDIX J

TYPE B AND C TEST FREQUENCY

Exemption: Commonwealth Edison requests a 30 day extension to the 2 year test interval in 10 CFR 50, Appendix J, Sections III.D.2(a) and III.D.3 for certain Type B and C components at Dresden Station Unit 3.

I. The Requested Exemptions and the Activities Which Would Be Allowed Thereunder are Authorized by Law

If the criteria established in 10 CFR 50.12(a) are satisfied, as they are in this case, and if no other prohibition of law exists to preclude the activities which would be authorized by the requested exemption, and there is no such prohibition, then the Commission is authorized by law to grant this exemption request. 1/

II. The Requested Exemptions Will Not Endanger Life or Property

As stated in 10 CFR 50, Appendix J, the purpose of the primary containment leak rate testing requirements is to ensure that leakage rates are maintained within the Technical Specification requirements and to assure that proper maintenance and repair is performed throughout the service life of the containment boundary components. The requested exemption is consistent with this intent in that it represents a one time only schedular extension of short duration (less than 5% of the normal test interval). The required leak tests will still be performed to assess compliance with Technical Specification requirements and to assure that any required maintenance or repair is performed. As noted in Sections III.D.2 and III.D.3 of Appendix J, it was intended that the testing be performed during refueling outages or other convenient intervals. Extending the 2 year interval by a small amount to reach the next refueling outage will not significantly impact the integrity of the containment boundary and therefore will not significantly impact the consequences of an accident or transient in the unlikely event of such an occurrence during the 30 day extended period. It should also be noted that Dresden Unit 3 will be operating in the coastdown mode during this period and will not be operating at rated power. This provides further assurance that the requested exemption will not endanger life or property.

III. The Requested Exemptions Will Not Endanger The Common Defense and Security

The common defense and security are not implicated in this exemption request. Only the potential impact on public health and safety is at issue.

IV. The Requested Exemptions Are in the Public Interest

The requested schedular extension is required to prevent a forced shutdown of Dresden Unit 3 on or about September 30, 1985. Preparations for a refueling and recirculation pipe replacement outage are proceeding based on the scheduled shutdown date of October 26, 1985. A forced shutdown on September 30 would result in an overall increase in the duration of the outage since equipment delivery and preparation and mobilization of work forces could not be accelerated sufficiently to support an almost one month advancement in the outage. The replacement power costs incurred to provide alternate supplies of power during the extended outage period would be borne by Commonwealth Edison customers. Since the requested exemption does not jeopardize the health and safety of the public as previously discussed, its approval is warranted in order to prevent the financial impact on Commonwealth Edison and our customers that would result from an early forced shutdown.

1/ See U.S. vs. Allegheny-Ludlum Steel Corp., 406 U.S. 742, 755 (1972).