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June 9, 1988

Mr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Review of Request for Continued
Operation Criteria for LPCI Piping
NRC Docket No. 50-237

Reference (a): Letter from J.R. Wojnarowski to H.R. Denton dated April 1, 1986.

(b): Letter from J.R. Wojnarowski to H.R. Denton dated April 11, 1986.

(c): Letter from R.A. Gilbert to Commonwealth Edison dated June 23, 1986 transmitting Summary of May 13, 1986 Meeting.

(d): Letter from I.M. Johnson to T.E. Murley dated September 4, 1987.

(e): Letter from I.M. Johnson to A.B. Davis dated January 29, 1988.

Dear Mr. Murley:

In References (a) and (b), Commonwealth Edison requested the use of a higher damping value for recirculation system piping. In Reference (c), your staff indicated such permission would be granted on a case-by-case basis. Reference (d) requested permission to use Reg. Guide 1.61 damping in design basis evaluations to justify the continued operation of the Dresden Unit 2 Low Pressure Core Injection (LPCI) piping.

In the course of the Dresden Unit 2 embedment strip plate evaluation, a support configuration on the LPCI system was then identified which (based on preliminary evaluations) exceeded design basis requirements. That preliminary evaluation was based on the assumption that the configuration should be modeled

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using fixed connections. In that case, it would have been necessary to seek the higher damping value to justify continued operation. Since that time, there have been numerous meetings with the Staff (both at NRR and NRC Region III) regarding this piping system specifically, and Flued Head Anchors in general. In a September 14, 1987 meeting, Commonwealth Edison and its representatives (Sargent & Lundy and Impell), explained that this system should actually be modeled using a pinned connection methodology. Using this methodology, a higher damping value is not required in order to justify continued operation.

Since this meeting, Commonwealth Edison has embarked upon a program to address the concerns of your staff regarding the flued head anchor design adequacy. Reference (e) explains the basis of the Flued Head Assessment program.

Commonwealth Edison wishes to withdraw Reference (d) as it has been determined that we no longer require the use of a higher damping value in order to establish the operability of Dresden Unit 2 LPCI piping (with the change in modeling methodology). Additionally, with a change in modeling methodology, the LPCI piping system support configuration meets the FSAR design requirements and there is no need for any future modification work. The calculations that support this finding are available for inspection and review by Regional personnel.

Please direct any questions you may have regarding this matter to this office.

Very truly yours,

I. M. Johnson
Nuclear Licensing Administrator

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cc: Dresden Resident Inspector
B. Siegel - NRR
A. B. Davis - RIII

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