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July 12, 1989

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

Subject: Dresden Nuclear Power Station Units 2 and 3  
 Inservice Testing Program Revision 3  
 Including Augmented NRC Testing  
NRC Docket Nos. 50-237 and 50-249

Reference: Letter from J.A. Silady to T.E. Murley dated  
 May 6, 1988 submitting Dresden IST Program, Rev. 2

Dr. Murley:

Attachment 1 summarizes changes to the referenced IST program for Dresden ASME Class 1, 2, and 3 pumps and valves, which were agreed to during onsite meetings with your staff and EG&G reviewers on May 23 and 24, 1989. The modified program is enclosed as Attachment 2 and has been designated Revision 3.

Commonwealth Edison (CECo) appreciates the input of your Staff/consultants. By providing timely revisions which are responsive to their input, CECo hopes that the associated TER and SER can be issued with few, if any, complications thereby allowing near term implementation of the modified program.

In the future, the IST program will be amended in accordance with Generic Letter 89-04 as needed to reflect plant modifications or changing regulatory or operational requirements.

Please contact this office should further information be required.

Very truly yours,

J.A. Silady  
 Nuclear Licensing Administrator

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Attachments (2)

cc: A.B. Davis - Regional Administrator, RIII  
 B.L. Siegel - Project Manager, NRR  
 S.G. DuPont - Senior Resident Inspector, Dresden  
 C. Ransom - EG&G, Idaho  
 Office of Nuclear Facility Safety - IDNS

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## IST PROGRAM REVISIONS (REVISION 1)

The following IST Program revisions have been written and incorporated in the attached IST Program submittal. The revisions listed below include the major revisions made as a result of the Dresden Nuclear Power Station Inservice Testing Program Review Meeting held May 23 and 24, 1989 with the U.S. Nuclear Regulatory Commission and EG&G Idaho, Inc.

The IST Program revisions listed below apply to the Sections outlined in the IST Program submittal.

## Section 7 - Listing of Augmented IST Pumps

1. Addition of the Fuel Pool Cooling Pumps.

## Section 8 - Pump DAIM's

1. DAIM P5 written to satisfy code requirements for observing oil level during pump testing.
2. DAIM's P2 and P3 have been deleted from the IST Program submittal.

## Section 9 - Pump Relief Requests

1. Relief request PR-6 was written to request relief from measuring suction pressure on the Standby Liquid Control pumps.
2. Relief request PR-7 was written in response to Daniel R. Muller to Henry E. Bliss letter dated September 1, 1988.

## Section 10 and 11 - Listing of IST Valves

1. Head Spray valve (205-27) changed to Cat AC and verified Open and Closed during refueling (VR-17).
2. Head Vent valves (220-46&47) deleted from IST Program. Do not perform an ACTIVE safety function.
3. Feedwater check valve (220-59) verified closed during refueling (VR-20).
4. Feedwater check valves (220-62A & 62B) verified closed during refueling (VR-21).
5. CRD Charging Water check valve verified closed during cold shutdown (DAIM-V4).
6. CRD Cooling Water check valve verified closed during quarterly (weekly rod motion testing).
7. Shutdown Cooling Pressure Isolation Valves (1001-1A, 1B, 2A, 2B, 2C, 5A, & 5B) changed from PASSIVE to ACTIVE.

8. Standby Liquid Control Injection valves (1101-15 & 16) verified closed open during refueling (VR-6 & ).
9. Standby Liquid Control explosive valves (1101-6A & 6B) frequency changed from refueling to Sample Plan Technique (SAM).
10. Reactor Water Cleanup check valve frequency changed to verified closed quarterly.
11. Auxiliary Reactor Water Cleanup pump suction valve changed from PASSIVE to ACTIVE.
12. Isolation Condenser Makeup check valves (1301-11 & 36 and 4107-501) frequency changed to Sampling Plan Technique (SAM) - disassembly/inspection (VR-11).
13. Core Spray stop check valves (1402-13A & 13B) will be verified to open quarterly using flow instrumentation.
14. Core Spray keep fill check valves (1402-34A & 34B) frequency changed to Sampling Plan Technique (SAM) - disassembly/inspection (VR-13).
15. Core Spray full flow return to torus test valves (1401-4A & 4B) changed from PASSIVE to ACTIVE. Unit 3 valves have also been changed to Cat A and leak tested each refueling.
16. Core Spray Injection check valves (1402-9A & 9B) changed to add leak test requirements and delete position indication test.
17. Core Spray pump discharge check valves (1499-14 & 15) deleted from IST Program since they do not perform a safety function.
18. LPCI Crosstie valves (1501-32A & 32B) will be stroked during cold shutdowns (DAIM-V25).
19. LPCI pump discharge check valves (1501-63A,B,C & D) changed to verify OPEN and CLOSED safety position each quarter.
20. LPCI keep fill isolation check valves (1501-67A & 67B) frequency changed to Sampling Plan Technique (SAM) for disassembly/inspection (VR-14).
21. Reactor Building Equipment Drains check valves (2001-102A & 102B) deleted from IST program since they do not perform an active safety function.
22. HPCI test return valve (2301-10) changed from PASSIVE to ACTIVE.
23. HPCI solenoid valve (2301-32) requirements changed to include Fail Safe Testing (FST) quarterly.
24. HPCI turbine exhaust check valve (2301-34) changed to verify the closed position during cold shutdown.

25. HPCI pump suction valve (2301-39) frequency changed to Sampling Plan Technique (SAM) for disassembly/inspection (VR-15).
26. HPCI booster pump to CST motor operated valves (2301-48 & 49) changed from PASSIVE to ACTIVE. Also the normal position of the valves was also changed.
27. HPCI injection check valve (2301-7) Category changed from AC to C and verified OPEN and CLOSED each refueling (VR-22).
28. HPCI turbine exhaust stop check valves (2301-71 & 74) changed to verify closed position during cold shutdown periods (DAIM-V11).
29. HPCI keep fill check valve (2354-500) changed frequency to Sampling Plan Technique (SAM) for disassembly/inspection (VR-18).
30. Reactor Building Cooling Water check valve (3769-500) deleted from IST program since the valve does not perform a safety function per 10 CFR 50 Appendix A, Criterion 57, Closed System Isolation Valves.
31. Control Room Emergency Air Conditioning check valve (2/3-5741-062) added to the IST program to be full stroke and fail safe tested quarterly.
32. Main Steam SRV Vacuum Breaker check valves (220-105A,B,C,D & E) changed frequency to refueling (VR-16 and DAIM 16).
33. Main Steam Isolation Valve Air Accumulator check valves changed to verify closure during refueling (VR-23).
34. Control Rod Drive Backup Scram valves test frequency changed to cold shutdown.
35. Control Rod Drive Scram Dump valves test frequency changed to cold shutdown.
36. Tip Ball valves (0733-A,B,C,D & E) changed from PASSIVE to ACTIVE.
37. LPCI Crosstie valves (1599-61 & 62) changed from PASSIVE to ACTIVE.
38. Drywell to Reactor Building Vacuum Breakers (1601-21,22,23 & 24) changed from PASSIVE to ACTIVE.
39. Pressure Suppression AO valves (1601-58 & 60) changed from PASSIVE to ACTIVE.
40. Suppression Pool to Torus manual valves (1699-59A, 59B, 65A & 65B) added to IST program as Category A, safety-related and leak rate tested each refueling.

41. Fuel Pool Cooling check valves (1901-27A & 27B) added to IST program as Category C, non safety-related and full stroke exercised each quarter.
42. Fuel Pool Cooling air operated bypass valve (1901-40) added to IST Program as Category B, non safety-related and full stroke exercised each quarter.
43. HPCI turbine vacuum breaker check valves (2399-76A, 76B, 77A, & 77B) changed test frequency to SAM for disassembly and inspection (VR-19).
44. Atmospheric Containment Atmosphere Dilution (ACAD) compressor check valve (2541-01) added to IST program as Category C, safety-related and full stroke exercised each quarter.
45. Diesel Generator Air Start check valves (4699-311A, 311B and 312) added to IST program as Category C, safety-related and full stroke exercised each quarter.
46. TIP Nitrogen Purge check valve (4799-514) changed test frequency from reactor refueling to cold shutdown (DAIM-21).
47. Diesel Oil Transfer Pump check valves (4202-A-500 & B-500) added to IST program as Category C, safety-related and full stroke exercised each quarter.
48. Diesel Generator Air Start Solenoid valve (6999-103) added to IST program as Category B, safety-related and full stroke, fail safe and position indication tested.
49. Diesel Generator Air Start check valve (6999-104) added to the IST program as Category C, safety-related and full stroke exercised quarterly.
50. High Radiation Sampling System air operated valves (8941-709 & 710) fail safe and position indication tests added to testing requirements.
51. Diesel Generator Air Start Accumulator Relief Valves added to the IST Program as Category C, safety-related and tested once every 5 years.
52. Diesel Oil Transfer Pump Discharge Relief Valves added to the IST Program as Category C, safety-related and tested once every 5 years.
53. Control Rod Drive Vessel Return Check Valve (3-0301-95, Unit 3 only) deleted from program since the valve no longer performs a function.
54. Excess Flow Check Valve 3-0263-2-31S was deleted from the program since the valve does not exist.

## Section 12 - DAIM for IST Valves

The DAIM index (included in the IST submittal) has been revised to include DAIM's which have been deleted and added to the program. The scope of the DAIM revisions was mainly due to test frequency changes from cold shutdown to reactor refueling periods. The DAIM index delineates which DAIM's have been deleted and also references the applicable relief request.

## Section 13 - Relief Requests for IST Valves

Various valve relief requests have been added to the program to include valve disassembly and inspection when valve operability can not be practically verified, and to perform alternative testing during reactor refuel when quarterly and cold shutdown testing is impractical.