

Docket File



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

July 20, 1989

Docket Nos. 50-237
and 50-249

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Dear Mr. Kovach:

SUBJECT: LEAK BEFORE BREAK CONCEPT RELATED TO IE BULLETIN 80-11, MASONRY WALLS, DRESDEN STATION UNITS 2 AND 3 (TAC NOS. 63970 AND 63971)

In your letter dated October 1986, in response to IE Bulletin 80-11, you provided your leak before break concept for establishing the acceptability of the masonry walls associated with the Reactor Water Cleanup System (RWCS) at Dresden Station. Leak before break evaluations under the broad scope rule (Revised GDC 4) are not permitted for materials subject to an active degradation mechanism. Utilization of this concept for the RWCU piping would require that you satisfy the criteria contained in Generic Letter 88-01 (NUREG 313, Rev 2) for a conforming material. It is recommended that you refer to the statement of considerations accompanying the amended rule, GDC-4, for further guidance. Net section collapse analyses in and by itself would not be adequate for a leak before break analysis to satisfy the broad scope rule for a conforming material.

Since the staff has determined your leak before break approach is unacceptable for the RWCS, it is requested that within 60 days of receipt of this letter, you provide a response containing your proposed actions to correct the resultant deficiencies in your masonry wall design.

Byron L. Siegel
Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

cc: See next page

*A/0-1
ew
DF01
1/1*

8907280245 890720
PDR AD0CK 05000237
9 PDC

Mr. Thomas J. Kovach
Commonwealth Edison Company

Dresden Nuclear Power Station
Units 2 and 3

cc:

Michael I. Miller, Esq.
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Mr. J. Eenigenburg
Plant Superintendent
Dresden Nuclear Power Station
Rural Route #1
Morris, Illinois 60450

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
Rural Route #1
Morris, Illinois 60450

Chairman
Board of Supervisors of
Grundy County
Grundy County Courthouse
Morris, Illinois 60450

Regional Administrator
Nuclear Regulatory Commission, Region III
799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

Mr. Michael E. Parker, Chief
Division of Engineering
Illinois Department of Nuclear Safety
1035 Outer Park Drive, 5th Floor
Springfield, Illinois 62704

July 20, 1989

Docket Nos. 50-237
and 50-249

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

DISTRIBUTION

Docket file	EJordan
NRC & Local PDRs	BGrimes
PDIII-2 r/f	KWichman
MVirgilio	RHerman
LLuther	ACRS (10)
BSiegel	Plant file
OGC	

Dear Mr. Kovach:

SUBJECT: LEAK BEFORE BREAK CONCEPT RELATED TO IE BULLETIN 80-11, MASONRY WALLS, DRESDEN STATION UNITS 2 AND 3. (TAC NOS. 63970 AND 63971)

In your letter dated October 1986, in response to IE Bulletin 80-11, you provided your leak before break concept for establishing the acceptability of the masonry walls associated with the Reactor Water Cleanup System (RWCS) at Dresden Station. Leak before break evaluations under the broad scope rule (Revised GDC 4) are not permitted for materials subject to an active degradation mechanism. Utilization of this concept for the RWCU piping would require that you satisfy the criteria contained in Generic Letter 88-01 (NUREG 313, Rev 2) for a conforming material. It is recommended that you refer to the statement of considerations accompanying the amended rule, GDC-4, for further guidance. Net section collapse analyses in and by itself would not be adequate for a leak before break analysis to satisfy the broad scope rule for a conforming material.

Since the staff has determined your leak before break approach is unacceptable for the RWCS, it is requested that within 60 days of receipt of this letter, you provide a response containing your proposed actions to correct the resultant deficiencies in your masonry wall design.

15/

Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

cc: See next page

PDIII-2:PM *BS*
BSiegel:dm

7/20/89

PDIII-2:LA
LLuther *LL*
6/29/89

P.S.
PDIII-2:(A)PD
PShemanski
7/20/89

120