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February 13, 1991

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Response to Inservice Testing (IST)
Program Safety Evaluation
NRC Docket Nos. 50-237 and 50-249

Reference: B. Siegel (NRC) letter to T. Kovach (CECo),
dated July 25, 1990.

Dr. Murley:

The referenced letter transmitted the safety evaluation for Revision 3 of the Dresden Station Inservice Testing (IST) Program for pumps and valves. The staff determined that the IST Program was acceptable for implementation provided the anomalies identified in Appendix 'C' of the Technical Evaluation Report (TER) were corrected within six months of receipt of the safety evaluation.

Attachment 'A' to this letter provides Commonwealth Edison Company's response to the anomalies identified in Appendix 'C' of the TER. Implementation procedure revisions are currently in progress to address the items in Appendix 'C', and it is expected that this effort will be completed by April 10, 1991.

Implementation procedure revisions associated with the relief requests which were approved by the safety evaluation, and recently installed modifications, are also in progress. It is expected that these procedure revisions will be completed by June 10, 1991. At that time, the IST program will be submitted reflecting the resolved anomalies.

The implementation of the procedure revisions have taken longer than expected due to an extended refueling outage, and dual unit outage period, since receipt of the safety evaluation.

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Please contact this office should further information be required.

Respectfully,

Milton H. Richter

M.H. Richter
Nuclear Licensing Administrator

Attachment 'A': Response to Appendix 'C' of the Technical Evaluation Report (IST Program Anomalies)

cc: A.B. Davis - Regional Administrator, Region III
B.L. Siegel - NRR Project Manager
D.E. Hills - Senior Resident Inspector, Dresden

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Response to Appendix "C" of the IST Technical Evaluation Report (TER), "IST Program Anomalies Found During the Review"

This response will address each of the 15 anomalies addressed in the IST program TER.

1. Relief Request PR-1.
   This requests relief from measurement of vibration displacement per IWP-4500 and proposes to measure vibration velocity and evaluate the data per OM-6.
   Dresden will utilize all of the criteria regarding vibration testing contained in ASME/ANSI OMa-1988, Part 6. This relief request will be revised to address all of the vibration testing criteria.

   a. Paragraph 4.5 will be revised, stating that axial vibrations will be taken on all pump thrust bearing housings. The second paragraph will be expanded to explain that the only reciprocating pumps in the IST Program are the SBLC pumps. Since these pumps run at a very low speed, the vibrations will be measured in displacement and the limits taken from OM-6.

   b. Paragraph 4.6 will be added stating that Dresden does not have any vertical line shaft pumps associated with the IST pump program.

   There are two pump procedures needing revisions in order to measure vibrations on the axial thrust bearings of the Containment Cooling Service Water (CCSW) and HPCI pumps. This is the only vibration requirement from OM-6 that needs to be incorporated into the IST Program.

2. Relief Request PR-7.
   This relief request is requesting for vibration limits higher than those allowed by OM-6 for the HPCI pumps.
   The limiting values of vibrations currently used at Dresden will be recorded in this relief request. The values were calculated based upon the multipliers in this relief request. The multipliers were derived from the reference values received from the first in-service test after the four-vane impeller was replaced with the five-vane impeller. The results of this impeller replacement were that the vibrations were reduced by approximately 50%, but some bearing vibration points were still relatively high.
   On the points still showing high vibrations, the required action multiplier limit was calculated so that the required action range would be close to the previous vibration level prior to impeller replacement. This will ensure that the vibrations are not allowed to substantially increase over time. This relief request will be revised to include the required action range.

3. Relief Request VR-2.
This requests relief from the test sample expansion requirement for the main steam safety valves if a tested valve fails "as-found" setpoint testing.
Dresden Station will expand as required by ASME Section XI when any one of the main steam safety valves fail the "as-found" setpoint test. This relief request will be withdrawn from the IST Program.

4. Relief Request VR-5.
This is requesting use of a newer edition of the ASME code to utilize the valve stroke time testing requirements. Newer editions of the code allow the stroke times, for valves with full-stroke times greater than 10 seconds, to be measured to 10% of the limiting stroke time. Measuring the stroke time to 10% of the specified limiting stroke time will, however, unnecessarily reduce the accuracy of the stroke times being recorded. Therefore, this option is being removed from the relief request and all power operated valves in the IST Program will be stroke timed to the nearest second.

5. Dresden Additional Information/Methodology DAIM-V1.
This DAIM is stating that the maximum stroke time listed in the Technical Specifications for power operated valves will be used in the IST Program even if the reference stroke time is considerably lower. This DAIM will be revised in order to meet the requirements of NRC Generic Letter No. 89-04, Attachment 1, Position 5. All power operated valves will have maximum stroke times based upon the multipliers given in the Dresden IST Administrative Procedure or the Technical Specifications, whichever is more conservative. The testing surveillances have already been revised to reflect this change.

6. Relief Request VR-6.
This is requesting to perform seat leakage testing in accordance with the requirements of 10 CFR 50 Appendix J or as amended by Technical Specifications, and to repair or replace as required when the leakage rate exceeds the maximum allowable as stated in the Technical Specifications or IWV-3427(a).
Primary containment isolation valves will be tested to the criteria of 10 CFR 50, Appendix J, Technical Specifications, IWV-3426, and IWV-3427(a). The testing will be in accordance with NRC Generic Letter 89-04, Attachment 1, Position 10. This relief request will be revised to reflect this position. Also, to comply with IWV-3426, which states that the leak rate measurements shall be compared with previous measurements, the leak rate testing Administrative Procedure will be revised to include this step.

7. Relief Request VR-8.
This requests to exercise the control rod drive alternate rod insertion air header bleed valves each cold shutdown without stroke timing.
These valves are verified operable during an Instrument Surveillance. This surveillance is currently under revision to add the appropriate acceptance criteria. The relief request will be revised to include this position.

8. Relief Request VR-9.
This is requesting to exercise the CRD backup scram and scram dump valves during cold shutdown without stroke timing.
Both the testing procedure and this relief request will be revised to have these valves stroked with appropriate acceptance criteria.

9. Relief Request VR-10.
Exclusion from performing the "as-found" setpoint test on the Target Rock safety-relief valves was being requested in this relief request. This relief request will be deleted. The Target Rock valve will be tested in its "as-found" condition.

10. Fuel Pool Cooling System.
The applicable pumps and valves on this system are included in the IST Program. The Special Procedures used to gather baseline data will be made into permanent procedures.

11. Relief Request VR-13.
This relief request was written in order to verify the closure capability of the core spray system keep-fill check valves by disassembly and inspection.
These check valves are being disassembled and inspected to verify their closure capability. A leak test will be written to test these valves in-series each refueling outage. The relief request will be revised.

12. Relief Request VR-14.
This relief request was written in order to verify the closure capability of the LPCI system keep-fill check valves by disassembly and inspection.
These check valves are being disassembled and inspected to verify their closure capability. A leak test will be written to test these valves in-series each refueling outage. The relief request will be revised.

13. Relief Request VR-18.
This relief request was written in order to verify the closure capability of the HPCI system keep-fill check valves by disassembly and inspection.
These check valves are being disassembled and inspected to verify their closure capability. A leak test will be written to test these valves in-series each refueling outage. The relief request will be revised.

14. Relief Request VR-19.
This relief request was written in order to verify the open and closure capability of the HPCI turbine exhaust vacuum breakers by disassembly and inspection.
These check valves are being disassembled and inspected to verify their open and closure capabilities. A test will be written to functionally test these valves open and closed each refueling outage. The relief request will be revised.

15. Relief Request VR-22.
This was requesting to part-stroke exercise the HPCI injection check valves open each cold shutdown, and full-stroke exercise them open and closed each refueling outage.
The 2(3)-2301-7 valve will be full-stroke exercised open during cold shutdown, and open and closed each refueling outage. To exercise this valve open, a mechanical actuator at the valve will be used and the torque required to move it will be measured per IWV-3522. This valve will also be leak tested during refuel outages to verify the closure capability. VR-22 will be revised to reflect this position. This valve is also going to be included on a new relief request, VR-36, being submitted in order to test the feedwater, reactor water cleanup, and HPCI check valves by leak testing them every refuel outage.