



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 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
Submittal of Relief Request for
Inservice Testing Program
NRC Docket Nos. 50-237 and 50-249

- References: (a) Conference Call on March 8, 1991
between CECO (M. Richter, et al.)
and NRR (B. Siegel).
- (b) Conference Call on March 9, 1991
between CECO (M. Richter, et al.)
and NRR (B. Siegel, et al.).

Dr. Murley:

As a result of the referenced teleconferences with your staff regarding recent Section XI Main Steam safety valve setpoint testing at Dresden Unit 2, Commonwealth Edison Company (CECO) is submitting the attached relief request to the Inservice Testing (IST) Program for Dresden Station (Units 2 and 3). The relief request permits utilization of acceptance criteria (3 percent greater than design set pressure) allowed by the 1986 Edition of the ASME Code (Section XI) for safety valve setpoint testing. This relief is necessary since the applicable Edition of Section XI for Units 2 and 3 (1977 Edition through the Summer 1979 Addenda) does not provide definitive acceptance criteria for the purposes of determining sample expansion during Main Steam safety valve setpoint testing ("as-found" testing). The relief request is for the duration of the current ten-year interval for the IST Program, which concludes on March 1, 1992.

It is CECO's understanding from the referenced teleconferences that this relief request is acceptable provided that a bounding overpressurization event is analyzed for each unit to ensure compliance with the Reactor Coolant System Safety Limit of 1345 psig. Reanalysis of the overpressurization event for each unit is expected to be completed by March 26, 1991. At that time, CECO will submit the results of the analysis.

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Dr. T.E. Murley

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Please direct any questions or comments on this letter to this office.

Respectfully,

Milton H. Richter

M.H. Richter
Nuclear Licensing Administrator

Attachment: Relief Request Number VR-25

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

MR:cag
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ATTACHMENT

RELIEF REQUEST NUMBER VR-25

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1. Description

1.1. Acceptance criteria for ASME Section XI testing of Main Steam safety valves.

2. Affected Components

Main Steam safety valves for Units 2 and 3.

<u>Valve EPN</u>	<u>Size (in.)</u>	<u>IST Cat.</u>	<u>Class</u>	<u>P&ID/Coord.</u>
2-203-4A	6	C	1	12-1/8E
2-203-4B	6	C	1	12-1/8E
2-203-4C	6	C	1	12-1/8D
2-203-4D	6	C	1	12-1/8D
2-203-4E	6	C	1	12-1/8C
2-203-4F	6	C	1	12-1/8C
2-203-4G	6	C	1	12-1/8B
2-203-4H	6	C	1	12-1/8B
3-203-4A	6	C	1	345-1/8E
3-203-4B	6	C	1	345-1/8E
3-203-4C	6	C	1	345-1/8D
3-203-4D	6	C	1	345-1/8D
3-203-4E	6	C	1	345-1/8C
3-203-4F	6	C	1	345-1/8C
3-203-4G	6	C	1	345-1/8B
3-203-4H	6	C	1	345-1/8B

3. ASME Section XI (S79) Test Requirement

3.1. IWV-3513, Additional Tests.

3.1.1. IWV-3513 requires that when a safety or relief valve in a system fails to function properly during setpoint testing, additional valves in the system shall be tested.

4. Basis for Relief

4.1. For Main Steam safety valve setpoint testing ("as-found" setpoint testing), IWV-3513 of the applicable Edition of Section XI (1977 Edition through the Summer 1979 Addenda) does not provide definitive acceptance criteria for the determination of additional valve testing (sample expansion). However, IWV-3513 of the 1986 Edition of Section XI provides acceptance criteria via a reference to ANSI/ASME OM-1-1981, which provides requirements for inservice performance testing of pressure relief devices. For Class 1 pressure relief devices, OM-1-1981 provides a setpoint acceptance criteria of three percent (3%) greater than the stamped (design) set pressure.

5. Alternative Test (Alternative Acceptance Criteria)

- 5.1. For Main Steam safety valve setpoint testing ("as-found" setpoint testing), the acceptance criteria allowed by the 1986 Edition of Section XI will be utilized. As a result, an acceptance criteria of +3% (3% greater than design set pressure) will be utilized for the determination of additional Main Steam safety valve setpoint testing. Sample expansion of the safety valves will be consistent with IWV-3513 of the currently applicable Edition of Section XI (1977 Edition through the Summer 1979 Addenda). In accordance with the current Technical Specifications, the setpoint of the Main Steam safety valves will be within plus or minus one percent ($\pm 1\%$) of design set pressure prior to installation.
- 5.2. Relief is requested for the second ten-year interval (March 1, 1982 to March 1, 1992) of the IST Program for Units 2 and 3.