

DISTRIBUTION
 Docket Files
 NRC PDRs
 LOCAL PDR
 ORB#2 Reading
 DLZiemann
 HSmith
 PO'Connor
 VStello
 OELD
 JRBuchanan
 TERA
 DGEisenhut
 BKGrimes
 ACRS)16)
 ORB#3 x/cpy file (7)
 ORB#2 x/cpy file (7)

OCT 26 1978

Docket Nos. 50-237
 50-249

Commonwealth Edison Company
 ATTN: Mr. Cordell Reed
 Assistant Vice President
 Post Office Box 767
 Chicago, Illinois 60690

Gentlemen:

We are reviewing the Inservice Inspection Program proposed for Dresden Unit Nos. 2 and 3 by your letter dated July 31, 1978. To continue our review, the additional information identified in Enclosure 1 is required.

This request relates to the pump and valve testing portion of your proposed program. At a future date additional information relative to the inservice inspection portion of your request may be required.

Please provide the requested information by November 30, 1978.

Sincerely,
 Original Signed by:
 Dennis L. Ziemann

Dennis L. Ziemann, Chief
 Operating Reactors Branch #2
 Division of Operating Reactors

Enclosures:
 As stated

cc w/encl:
 See next page

PILOT 833

| | | | | | |
|-----------|--------------|-----------|--|--|--|
| OFFICE > | DOR:ORB#2 | DOR:ORB#2 | | | |
| SURNAME > | PO'Connor:lb | DLZiemann | | | |
| DATE > | 10/25/78 | 10/24/78 | | | |

Commonwealth Edison Company

- 2 -

October 26, 1978

cc

Mr. John W. Rowe
Isham, Lincoln & Beale
Counselors at Law
One First National Plaza, 42nd Floor
Chicago, Illinois 60603

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

Anthony Z. Roisman
Natural Resources Defense Council
917 15th Street, N. W.
Washington, D. C. 20005

Morris Public Library
604 Liberty Street
Morris, Illinois 60451

REQUEST FOR ADDITIONAL INFORMATION
INSERVICE INSPECTION AND TESTING PROGRAM
DRESDEN STATION UNIT NOS. 2 & 3
DOCKET NOS. 50-237 & 50-249

NOTE: Numbers shown refer to specific relief request notes in the CE inservice testing report. Section XI and Appendix J refer to the ASME code and 10 CFR 50, respectively.

GENERAL QUESTIONS AND COMMENTS

Pumps

1. The reasons stated in Notes A3 and A4 do not provide sufficient information for granting relief. Provide specific technical information to support the determination that measuring bearing temperature and all other pump parameters in accordance with the requirements of Section XI is impractical.
2. CE states that pump vibration tests will be conducted and analyzed quarterly. What is the specific technical basis for not complying with the monthly requirement of Section XI?

SPECIFIC QUESTIONS AND COMMENTS

Pumps

A. Diesel Cooling Water

Component Cooling Service Water System

1. CE states in Note A2 that instrumentation to directly measure P_j does not exist. How is ΔP measured or calculated? What alternate methods to determine P_j have been considered and what specific technical basis was used to determine these methods impractical? What supplies the NPSH for these pumps? How is diesel cooling pump flowrate measured?

B. High Pressure Coolant Injection System

Poison Injection System

1. CE states in Note A1 that instrumentation to directly measure P_i does not exist. How is ΔP measured or calculated? What steps are being taken to assure compliance with code requirements?

GENERAL QUESTIONS AND COMMENTS

Valves

1. Have valve tests E* and ET been incorporated into your operating procedures for all valves identified?

2. What are valve tests PIT, HR, and FST?
3. Provide specific technical reasons to justify why you do or do not agree with our category changes and valve additions. Consider each valve and explain the consequence if it failed to function properly or was left out of its required operating position during an accident situation.
4. For those valves that you have proposed to exercise during cold shutdown: 48 hours is the time period that defines how long the plant will be at cold shutdown before valve exercising will be initiated. How will you assure that valves not exercised during a given cold shutdown will be exercised at subsequent cold shutdowns prior to the next refueling outage? Approximately how long will it take to exercise all the valves that you have proposed to test at cold shutdowns?
5. Identify all valves that require a check of valve position indicators per IWV-3300. These valves should be listed for our review.
6. In a November, 1976 letter, the NRC provided a document titled NRC Staff Guidelines for Excluding Exercising (cycling) Tests of Certain Valves During Plant Operation. In particular, this document stated that when one train of a redundant system such as ECCS is inoperable, nonredundant valves in the remaining train should not be cycled since their failure would cause a loss of total system function. For instance, during power operation in some plants, there are stated minimum requirements for the ECCS which allow certain limiting conditions for operation to be true at any one time and if the system is not restored to meet the requirements within the time period specified in a plant's TS, the reactor is required to be put in some other mode. Furthermore, prior to initiating repairs, all valves and interlocks in the system that provide a duplicate function are required to be tested to demonstrate operability immediately and periodically thereafter during plant operation. This situation would be contrary to the NRC guidelines as stated in the document mentioned above.

Identify where, if any, existing operating procedures or TS requirements may be contrary to the above mentioned guideline and what action will be taken to meet the guidelines mentioned above.

SPECIFIC QUESTIONS AND COMMENTS

Valves

A. Reactor-Recirculation System

1. The specific relief requested in note B2 for valve 205-27 does not

apply. What is the specific technical basis for not leak testing this valve in accordance with Section XI?

2. Specific relief was requested in note B4 from exercising valve 205-27 every 3 months. Provide more specific technical information to support the determination that exercising this valve each cold shutdown is impractical.

B. Hydraulic Control Rod Drive System

1. Review the safety related function or closed system containment isolation valves CV-0305-127 and CV-305-126 to determine if they should be categorized A. (Refer to valves - general questions and comments number 3 for your reply.)
2. Specific relief was requested in note B3 from full stroke exercising valves 0305-114, 115, 126, 127, and 138 every 3 months. Provide specific technical reasons why these valves cannot be full stroke exercised every 3 months. Technical specification requirements are not suitable justification for not complying with Section XI.
3. What is the specific technical basis for not stroke time testing A0 valves 0305-126, 127, and 0302-21A, 21B, 22?
4. Review the safety related function of the following valves to determine if they should be categorized as indicated: (Refer to valves - general questions and comments number 3 for your reply.)

| <u>Category E</u> | <u>Category A/E</u> | <u>Category A/C</u> |
|-------------------|---------------------|---------------------|
| 2-0305-112 | 2-0399-504, 506 | 2-0305-138 |

5. The NRC staff considers the following valves safety related, and therefore they should be included in your I.S.T. program and categorized as indicated: (Refer to valves - general questions and comments number 3 of your reply.)

| <u>Category A/E</u> | <u>Category A</u> | <u>Category C</u> |
|---------------------|---|-------------------|
| 0301-94 | FVC-0305-120, 123 SO-0305-121 SO-0305-122 | 302-23 |

C. Shutdown Reactor Cooling System

1. Specific relief was requested in note B20 from leak checking valves 1001-1A, 1B, 2A, 5A and 5B. These valves perform both a pressure boundary isolation and a containment isolation function, and shall

be leak tested to meet the requirements of Section XI and Appendix J. What is the specific technical basis for not leak testing these valves in accordance with the requirements of Section XI?

2. The NRC staff considers the following valves safety related, and therefore they should be included in your IST program and categorized as indicated: (Refer to valves - general questions and comments number 3 for your reply.)

Category C

1001-3A, 3B, 3C

Category B

1001-4A, 4B, 4C

D. Standby Liquid Control System

1. Specific relief was requested in note B2 from leak checking valves 1101-15 and 16. What is the specific technical basis for not leak checking these pressure boundary isolation valves in accordance with the requirements of Section XI?

E. Reactor Water Clean-Up

1. Specific relief was requested in note B8 from exercising valve 1201-158. State the specific reasons why this valve cannot be exercised during cold shutdowns. What alternate tests have been considered? All tests should be identified and specific technical reasons given to support the determination that these tests are impractical.

F. Core Spray System

1. Specific relief was requested in Note B20 from leak checking valves 1402-9A, 9B, 25A and 25B. These valves perform both a pressure boundary isolation and a containment isolation function, and should be leak tested to meet the requirements of Section XI and Appendix J. What is the specific technical basis for not testing these valves in accordance with the requirements of Section XI?
2. Specific relief was requested in note B10 from stroke time testing valves 1402-38A and 38B. What is the specific technical basis for not stroke time testing these valves? What would be the safety related consequence if these valves failed to close in a reasonable amount of time during a LOCA?
3. Review the safety related function of valves 1402-19A, 19B, 18A, and 18B to determine if they should be categorized E. What would be the consequence if these valves were left out of their required operating position during an accident situation?

G. Low Pressure Coolant Injection

1. Specific relief was requested in note B20 from leak testing valves 1501-25A, 25B, 22A, and 22B. These valves perform both a pressure boundary isolation and a containment isolation function, and should be leak tested to meet the requirements of Section XI and Appendix J. What is the specific technical basis for not testing these valves in accordance with the requirements of Section XI?
2. Containment isolation valves 1501-28A, 28B, 27A, 27B, 18A, 18B, 19A, 19B, 20A, 20B, 38A, and 38B are not closed system isolation valves as stated in relief request note B11. Review GDG-57. What is the specific technical basis for not leak checking these valves in accordance with the requirements of Appendix J?
3. Specific relief was requested in note B10 from stroke time testing valves 150-13B and 13A. What is the specific technical basis for not stroke time testing these valves? What would be the safety related consequence if these valves failed to close in a reasonable amount of time during a LOCA?
4. The NRC staff considers valves 1501-75A, B, C, D, and 1501-76A, B, C, D safety related, and therefore they should be included in your IST program and categorized E. (Refer to valves - general questions and comments number 3 for your reply.)

H. Pressure Suppression Piping

1. Specific relief was requested in note B11 for all valves identified in this system. This is not a closed system and note B11 does not apply. These valves should be leak tested in accordance with the requirements of Appendix J?
2. Review the safety related function of check valves 1601-32A through 32F and 1601-33A through 33F to determine if they should be included in your IST program and categorized C. (Refer to valves - general questions and comments number 3 for your reply.)

I. Fuel Pool Cooling

1. P & ID OISI-31 is not clear as to which lines penetrate the drywell. Provide us with a more detailed drawing or explanation. If the drywell is penetrated, review the safety related function of the associated valves to determine if they should be included in your IST program and categorized A/E. (Refer to valves - general questions and comments number 3 for your reply.)

J. High Pressure Injection System

1. State the specific reasons why motor operated valve 2301-3 is not stroke time tested.
2. Specific relief was requested from exercising valves 2301-34 and 45 and 2301-71 in notes B17 and B18 respectively. Provide specific technical information to support the determination that exercising these valves during other than refueling outages is impractical.

K. Main Steam System

1. Should electromatic relief valves identified in relief request B19 actually be designated 203-3A through 3E?
2. Should containment isolation valves identified in relief request B13 acutally be designated 203-1A through 1D and 203-2A through 2D?
3. State the specific reasons why containment isolation valves 203-2A through 2D are not and cannot be stroke time tested.

L. Reactor Feedwater

1. Specific relief was requested in note B14 from exercising valves 220-58A and 220-62A and 62B. State the specific reasons why these valves cannot be exercised during each cold shutdown that the dry-well is accessible.
2. Specific relief was requested in note B8 from exercising valve 220-59. What is the specific technical basis for not exercising this valve each cold shutdown?
3. Review the safety related function of in-line valve 220-57B to determine if it should be categorized E. (Refer to valves - general questions and comments number 3 for your reply.)
4. What is the test mode for the "AT" test performed on valves 220-62A and 62B?

M. Reactor Building Cooling Water

1. Why does CE request relief in note B12 for leak testing valves 3702 and 3703 when testing in accordance with Appendix J meets the requirements of Section XI?

N. Service Water

1. Review the safety related function of diesel generator multiposition water regulating valves 3930-525 and 3931-525 to determine if they should be categorized B instead of locked open category E. What would be the consequence if these valves failed to properly regulate flow?
2. The NRC staff considers the following valves safety related, and therefore they should be included in your IST program and categorized E. (Refer to valves - general questions and comments number 3 for your reply.)

Unit 2

3934-A & B & C-500
3999-280 through 284

Unit 3

39999-274, 276, 277, 279 and 293
3999-264, 265, 267, 268 and 269

O. Well Water System

1. Review the safety related function of containment isolation valves 4327-500 and 4327-502 to determine if they should be categorized A/E. (Refer to valves - general questions and comments number 3 for your reply.)

P. Reactor Building Equipment Drain System

1. Review the safety related function of valve 2001-3 instead of 20001-6 to determine if it should be categorized A. This change would meet the intent of GDC-57.

Q. Corrosion Test and Diesel Startup Air System

1. Review the safety related function of MOV-50001-3 to determine if it should be categorized B. (Refer to valves - general questions and comments number 3 for your reply.)