



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

August 18, 2017

Mr. Bryan C. Hanson
Senior VP, Exelon Generation Co., LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3—NOTIFICATION OF AN NRC TRIENNIAL HEAT SINK PERFORMANCE INSPECTION AND REQUEST FOR INFORMATION; INSPECTION REPORT 05000237/2017004; 05000249/2017004

Dear Mr. Hanson:

On October 16, 2017, the U.S. Nuclear Regulatory Commission (NRC) will begin the onsite portion of the Triennial Heat Sink Performance Inspection at your Dresden Nuclear Power Station, Units 2 and 3. This inspection will be performed in accordance with NRC baseline Inspection Procedure 71111.07.

In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a request for documents needed for the inspection. The documents have been divided into three groups.

- The first group lists information necessary for our initial inspection scoping activities. This information should be available to the lead inspector no later than September 5, 2017. By September 12, 2017, the inspector will communicate the initial selected set of approximately 2–3 risk-significant heat exchangers.
- The second group is needed to support our in-office preparation activities. This set of documents, including the calculations associated with the selected heat exchangers, should be available at the Regional Office no later than October 3, 2017. This information should be separated for each selected component, especially if provided electronically (e.g., folder with component name that includes calculations, condition reports, maintenance history, etc.). During the in-office preparation activities, the inspector may identify additional information needed to support the inspection.
- The last group includes the additional information above as well as plant specific reference material. This information should be available onsite to the inspector on October 16, 2017. It is also requested that corrective action documents and/or questions developed during the inspection be provided to the inspector as the documents are generated.

All requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous Heat Sink Performance Inspection. If no activities were accomplished in that time period, then the request applies to the last applicable document in the previous time period. It is important that these documents be as complete as possible, in order to minimize the number of documents requested during the preparation week or during the onsite inspection.

The lead inspector for this inspection is Mr. Gerard O'Dwyer. We understand that our licensing contact for this inspection is Mr. Dean J. Walker of your organization. If there are any questions about the inspection or the material requested in the enclosure, please contact the lead inspector at 630-829-9624 or via e-mail at Gerard.ODwyer@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number.

This letter and its enclosure will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with 10 CFR 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Gerard O'Dwyer, Reactor Inspector
Engineering Branch 2
Division of Reactor Safety

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosure:
Triennial Heat Sink Performance Inspection
Document Request

cc: Distribution via LISTSERV®

Letter to Bryan C. Hanson from Gerard O'Dwyer dated August 18, 2017

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3—NOTIFICATION OF AN NRC TRIENNIAL HEAT SINK PERFORMANCE INSPECTION AND REQUEST FOR INFORMATION; INSPECTION REPORT 05000237/2017004; 05000249/2017004

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TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

Inspection Report: 05000237/2017004; 05000249/2017004

Inspection Dates: October 16 - 20, 2017

Inspection Procedure: IP 71111.07, "Heat Sink Performance"

Lead Inspector: Gerard O'Dwyer
630-829-9624
Gerard.ODwyer@nrc.gov

Please provide the information electronically in "pdf" files, Excel, or other searchable formats, preferably on some portable electronic media (e.g., CD-ROM, DVD). The portable electronic media should contain descriptive names, and be indexed and hyperlinked to facilitate ease of use. Information in "lists" should contain enough information to be easily understood by someone who has knowledge of light water reactor technology.

I. Information Requested By September 5, 2017:

1. List of the Generic Letter (GL) 89-13, "Service Water System Problems Affecting Safety-Related Equipment," heat exchangers in order of risk significance.
2. Copy of heat exchanger performance trending data tracked for each GL 89-13 heat exchanger.
3. List of Corrective Action Program (CAP) documents (with a short description) associated with GL 89-13 heat exchangers, heat sinks, silting, corrosion, fouling, aging, or heat exchanger testing, ultimate heat sink (UHS), and safety-related service and closed cooling water systems for the previous 3 years or since the last CAP document list was sent to the U.S. Nuclear Regulatory Commission for the previous heat sink performance inspection. The list should include all CAP documents not on the last CAP document list.
4. Copy of any self-assessment done on any of GL 89-13 heat exchangers, UHS, and safety-related service water systems since the last heat sink performance inspection.
5. Last two System Health Report(s) and maintenance rule system notebooks for all the GL 89-13 heat exchangers, UHS, and safety-related service water systems.
6. List of engineering-related operator workarounds (with a short description) associated with GL 89-13 heat exchangers. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
7. List of permanent and temporary modifications (with a short description) associated with GL 89-13 heat exchangers, UHS, and safety-related service and closed cooling water systems. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.

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TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

8. Electronic copies of the current Final Safety Analysis Report (FSAR), Technical Specifications, Technical Specifications Basis, and Technical Report Manual.
9. List of enhancements and/or commitments made during license renewal for GL 89-13 heat exchangers, UHS, and safety-related service water systems (as applicable).

II. Information Requested By October 3, 2017:

1. Copies of the GL 89-13 responses.
2. Copies of procedures developed to implement the recommendations of GL 89-13 (e.g., the GL 89-13 Heat Exchanger Program description).
3. Copies of the selected CAP documents.
4. For the specific heat exchangers selected:
 - a. Copy of system descriptions and applicable Updated FSAR sections for the heat exchangers (as applicable).
 - b. Provide a list of calculations (with a short description) which currently apply to each heat exchanger.
 - c. Provide the calculations or evaluations that:
 - i. establish the limiting design basis heat load required to be removed by each of these heat exchangers;
 - ii. demonstrate the heat exchangers capacity to remove the limiting heat load;
 - iii. correlate surveillance testing and/or inspection results from these heat exchangers with design basis heat removal capability (e.g., basis for surveillance test and/or inspection acceptance criteria);
 - iv. evaluate the potential for water hammer in each heat exchanger or associated piping; and
 - v. evaluate excessive tube vibration in each heat exchanger.
 - d. Copy of any operability determinations or other documentation of degradation associated with the heat exchangers or the systems that support the operation for the selected heat exchangers.
 - e. Copy of the design specification, heat exchanger data sheets, and vendor documents including component drawings applicable for the selected heat exchangers.
 - f. Copies of normal, abnormal, and emergency operating procedures associated with the selected heat exchangers.

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- g. Copies of the Aging Management Programs (AMP) and the implementing procedures that manage aging of the selected heat exchangers (as applicable).
5. For the UHS and the safety-related service water systems (or equivalent):
- a. Copy of system description and applicable Updated FSAR sections (as applicable).
 - b. Copy of any operability determinations or other documentation of degradation associated with the UHS and the safety-related service water systems.
 - c. Copy of the document (e.g., Updated FSAR or Technical Requirements Manual) that states the maximum cooling water system inlet temperature limit that still allows full licensed power operation of the nuclear reactor.
 - d. Copy of system description and design basis document (as applicable).
 - e. Copy of the construction code and Design Specification.
 - f. Copies of normal, abnormal, and emergency operating procedures associated with the UHS and safety-related service systems including procedures for loss of these systems.
 - g. Copies of CAP documents associated with waterhammer or hydraulic transients in the safety-related service water systems since the last Heat Sink Inspection.
 - h. If available, provide an electronic copy of piping and instrumentation diagrams for the service water systems, including the intake structure.
 - i. Provide a list of calculations (with a short description), which currently apply to the UHS and safety-related service water systems.
 - j. Provide a list of instruments (with a short description) associated with automatic or alarm functions for the UHS and safety-related service water systems.
 - k. Provide a list of any design change (with a short description) performed on the UHS and safety-related service water systems since the last heat sink performance inspection.
 - l. Copies of the AMPs and the implementing procedures that manage aging of the UHS (including the intake structure) and the safety-related service (as applicable).
6. A schedule of all inspections, cleanings, maintenance, or testing of any safety-related plant heat exchanger to be performed during the onsite portion of the inspection.

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III. Information Requested to be Available on First Day of Inspection, October 16, 2017:

1. For the specific heat exchangers selected.
 - a. Copy of the calculation which correlates surveillance testing results from these heat exchangers with design basis heat removal capability (e.g., basis for surveillance test acceptance criteria).
 - b. Copies of the two most recent completed tests and evaluation data confirming thermal performance for those heat exchangers which are performance tested.
 - c. Documentation and procedures that identify the types, accuracy, and location of any special instrumentation used for the two most recently completed thermal performance tests for the heat exchangers (e.g., high accuracy ultrasonic flow instruments or temperature instruments). Include calibration records for the instruments used during these tests.
 - d. Information regarding any alarms which monitor on-line performance.
 - e. Copy of the document describing the inspection results of each heat exchanger. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - f. The cleaning and inspection maintenance schedule for each heat exchanger for the next 5 years.
 - g. Copy of the calculation which establishes the limiting (maximum) design basis heat load which is required to be removed by each of these heat exchangers.
 - h. Copy of the operating procedure that ensures that the maximum cooling water system inlet temperature limit is not exceeded.
 - i. Copy of the calculations or documents which evaluate the potential for water hammer in each heat exchanger or associated piping.
 - j. Copy of the calculations that evaluate excessive tube vibration in each heat exchanger and the documents that describe the controls that prevent heat exchanger degradation due to excessive flow induced vibration during operation.
 - k. Copy of the periodic flow testing at or near maximum design flow. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - l. Copy of the document which identifies the current number of tubes in service for each heat exchanger and the supporting calculation which establishes the maximum number of tubes which can be plugged in each heat exchanger.
 - m. Copy of the document establishing the repair criteria (plugging limit) for degraded tubes which are identified in each heat exchanger.

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- n. Copies of the documents that verify the structural integrity of the heat exchanger (e.g., eddy current summary sheets, ultrasonic testing results, and visual inspection results).
 - o. Copies of those documents that describe the methods taken to control water chemistry in the heat exchangers, including those credited by any AMPs (as applicable).
 - p. Copies of any credited AMP monitoring/inspection results for the selected heat exchangers (as applicable). The requested documents are to be for any completed monitoring/inspection in the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
2. For the review of the operation of the safety-related service water systems and the UHS:
- a. Copies of any design changes performed on the UHS. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - b. Copies of any design change performed on the safety-related service water systems. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - c. Copies of procedures for a loss of UHS.
 - d. Copies of procedures for a loss of service water systems.
 - e. Inspections and/or maintenance related to preventing macrofouling (e.g., silt, dead mussel shells, or debris) and biotic fouling (e.g., fish, algae, grass, or kelp). The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - f. Copies of documents associated with the monitoring of pump performance for potential strong-pump vs. weak-pump interaction.
3. For the review associated with the system walkdown of the service water intake structure:
- a. Copies of documentation that demonstrates proper functioning of the traveling screens and strainers including backwash strainer function, (e.g., copies of the last two inspections and surveillances associated with service water strainers, traveling screens and trash racks).
 - b. List of preventive maintenance, including frequency, associated with service water strainers, traveling screens and trash racks

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- c. Copies of abnormal procedures for the traveling screens and service water strainers.
- d. Copies of the last two inspections and/or surveillances documenting that component mounts have not excessively degraded (i.e., due to corrosion). For example, inspections for the mounts for the service water pumps, service water strainers, traveling screens and trash racks.
- e. Copies of the documents associated with the monitoring, trending, and remediation of silt accumulation at the service water pump bay.
- f. Copies of surveillance procedures and testing results performed on the service water pump bay water level instruments. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
- g. Copies of procedures associated with operating during adverse weather conditions (e.g., icing especially frazil icing, high temperatures, or low level).
- h. Copy of the evaluation for the potential effects of low flow/level on underwater weir walls intended to limit silt or sand intake, if applicable.
- i. Copies of any credited AMP monitoring/inspection results for the safety-related service and closed cooling water systems, and the UHS (as applicable). The requested documents are to be for any completed monitoring/inspection in the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.

If the information requested above will not be available, please contact Gerard O'Dwyer as soon as possible at 630-829-9624 or e-mail Gerard.ODwyer@nrc.gov.