



**Commonwealth Edison**  
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December 20, 1978

Mr. Dennis L. Ziemann, Chief  
 Operating Reactors - Branch 2  
 Division of Operating Reactors  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Subject: Dresden Station Unit 1  
 10 CFR Part 50 Appendix J  
 Review Information  
NRC Docket No. 50-10

References (a): M. S. Turbak letter to D. K. Davis  
 dated May 20, 1977.

(b): D. L. Ziemann letter to R. L. Bolger  
 dated January 24, 1977.

Dear Mr. Ziemann:

Reference (a) transmitted our response to several questions regarding the Dresden Unit 1 Appendix J local leak rate testing, transmitted from your office by Reference (b). Question 2d requested additional information regarding sphere penetrations with isolation valves having automatic closure actuation signals. Our response stated that an inspection would be performed during the chemical cleaning outage to determine the possibility of modifications. As a result of that inspection, we plan to modify the following lines to make them comply with Appendix J local leak rate test requirements. These modifications will be completed during the chemical cleaning outage.

<u>Valve Number</u>	<u>Line No.</u>	<u>Penetration Number</u>	<u>Line Description</u>
MO 523	1422	H44	Four-inch line from the clean-up demineralizer tanks C-8A and C-8B to radwaste.
FCV 504	7124	H66	Two-inch line carrying clean demineralized water from storage tank T-105B to the sphere service water booster pump.
MO 506	4410	H47	Four-inch line from reactor enclosure drain tank T-122A to radwaste collector tank T-109.

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<u>Valve Number</u>	<u>Line No.</u>	<u>Penetration Number</u>	<u>Line Description</u>
VFC 509	4414	H43	Two-inch line from resin transfer pumps G-28A and G-28B to resin burial tank T-113.
VFC 515	1400	H52	Three-inch line from the secondary steam generators "A", "B", "C", and "D" to blowdown tank C-21.
FCV 534	7091	H15	Three-inch line carrying heating system condensate back to U-1 heating boiler deaerator.

The following valves should be exempted from the requirements of 10 CFR 50 Appendix J for the reasons stated.

<u>Valve Number</u>	<u>Function</u>	<u>Reason for Exemption</u>
MO 1	Secondary steam supply to air ejectors.	MO 1 is outside of the primary containment and is downstream of the secondary steam line testable isolation valves.
MO 521	Containment cooling water discharge to river.	The containment closed-cooling water system would require that all essential cooling systems within the containment be shutdown during a local leak rate test. If the 16-inch containment service water line was modified for local leak rate test purposes, the essential cooling systems required to remove the reactor decay heat during cold shutdown would be inoperable for local leak rate tests.
MO 529 MO 532 MO 533 MO 534	A, B, C, and D secondary steam generator sample lines.	Motor operated valves 529, 532, 533, and 534 are upstream of FCV 510 and 511 which are local leak rate tested. Since all of the automatic isolation valves control flow to a common line, (4493-1" G1) which comes from instrument room "C", the local leak rate testing between the 510 and 511 valves on line 4493-1 G1 insures sphere integrity.

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<u>Valve Number</u>	<u>Function</u>	<u>Reason for Exemption</u>
AO 513	Supply of filtered water to the fuel transfer canal through line No. 5604-2 G4.	The water supply line to the fuel handling canal ties into the fuel transfer tube. Since the volume in the transfer tube between the transfer tube cover and MO 541 and 547 is local leak rate tested, it is not necessary to make AO 513 testable.
FCV 364	Secondary steam line drain at turbine.	Local leak rate tests are performed upstream of FCV 364. These tests are performed between valves MO 159; MO 160, 161, and 162; MO 165 and 166; and MO 163 and 164. Since containment integrity is tested at these points, it is not necessary to make FCV 364 testable.

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,

  
M. S. Turbak  
Nuclear Licensing Administrator  
Boiling Water Reactors