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Dresden Generating Station
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10CFR 50.55a(a)(3)(i)



July 28, 2000

PSLTR: 00-0111

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Relief Request for Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions

Reference: Letter from P. Swafford (ComEd) to USNRC, "Relief Request for Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," dated June 30, 2000

In the referenced letter, Commonwealth Edison (ComEd) Company, in accordance with 10 CFR 50.55a, "Codes and standards," paragraph (a)(3)(i), requested permanent relief from the inservice inspection (ISI) requirements of 10 CFR 50.55a(g) "Inservice Inspection Requirements," to allow the use of alternative requirements for snubber visual inspection intervals and corrective actions at Dresden Nuclear Power Station (DNPS) Units 2 and 3, for all safety related hydraulic and mechanical snubbers.

On July 20, 2000, a teleconference was held to respond to questions raised by the NRC with regard to the referenced letter. The purpose of this letter is to clarify our submittal.

DNPS Units 2 and 3 currently are in the third Period of the third Interval of our ISI program. For DNPS Unit 2, the current period ends on January 19, 2003. For DNPS Unit 3, the current period ends on October 31, 2002.

The applicable American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components" Edition and Addenda for inspections of these snubbers, at DNPS Units 2 and 3, is the 1989 Edition, no Addenda. ASME B&PV Code Section XI subparagraphs IWF-5200 (a) and IWF-5300 (a), in turn, incorporate by reference Operations and Maintenance (OM) 1987 Edition, Part 4, published in 1988 (i.e., OMa-1988 Part 4, per 10CFR50.55a, "Codes and Standards," paragraph (b)(2)(viii)).

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Because DNPS's Technical Specifications (TS) require visual examination of all 189 ASME Code Class 1, 2, 3, and MC safety related snubbers, and, only on Unit 2, 3 safety related non-code snubbers, the overlap of the inspections required by TS and ASME Section XI for the Code Class snubbers presents an unnecessary redundancy. Based on our review, we have concluded that the snubber visual examinations required by TS 3/4.8.F, "Snubbers," meet the intent of the program required by OMa-1988, Part 4. No plant safety benefits will be realized by imposing both programs on the Code Class snubbers at Dresden Station.

Should you have any questions concerning this letter, please contact Mr. D.F. Ambler at (815) 942-2920 extension 3800.

Respectfully,



Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Attachment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station