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10 CFR 50.4

January 31, 2001

PSLTR: #01-0011

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


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

Subject: 2000 Regulatory Commitment Change Summary Report

The 2000 Commitment Change Summary for Dresden Nuclear Power Station as referenced in Attachment A is enclosed. Revisions to docketed correspondence were processed using Nuclear Energy Institute's (NEI's) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes", dated July 1999.

Should you have any questions concerning this summary, please contact Dale F. Ambler, Regulatory Assurance Manager at 815-942-2920, extension 3800.

Respectfully,



Preston Swafford  
Site Vice President  
Dresden Nuclear Power Station

Enclosure: Attachment A: Dresden Nuclear Power Station Revised Commitment Summary for 2000

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

A0001

**Attachment A**  
**Dresden Nuclear Power Station**  
**Commitment Change Summary for 2000**

<b>Commitment Revision Tracking No.</b>	<b>Date of Commitment Revision</b>	<b>Original Document</b>	<b>Original Commitment</b>	<b>Revised Commitment</b>	<b>Basis For Revision</b>
00-001	1/27/00	NRC Inspection Report 50-237/83-44 & 50-274/83-38	The annual training provided to individuals assigned to perform fire watch activities for hot work (ie cutting and welding) would include practice extinguishing a small Class B test fire.	Participants in the annual NGG hot work fire watch refresher educational class may be exempt from extinguishing a small fire provided they have previously participated in a hands-on practice session that included extinguishing a test fire with a portable extinguisher. However, a hands-on practice session will be provided to all trainees who would like to participate in a refresher training session.	Revised commitment satisfies NFPA 51B, "Fire Prevention in use of Cutting and Welding Processes" and applicable OSHA educational and training requirements. Therefore, reasonable assurance that a fire watch will be able to extinguish incipient stage hot work fires is provided.
00-002	2/10/00	NRC Inspection Report 50-237/93012	During routine inspection the IDNS Inspector found a Protected Pathway sign laying on the drywell grating twice. This Protected Pathway sign originally was on the Electromatic Relief Valves (ERVs) which was no longer required. This led to a commitment in Dresden Administration Procedure (DAP) 18-05 Shutdown Risk Assessment and Management procedure to "maintain a log of all Protected Pathways".	Delete this commitment.	The Shutdown Risk program has been dramatically improved since this Nuclear Regulatory Commission (NRC) inspection. Protected Pathways are now tracked by a Shutdown Risk Manager on a 24 hour a day basis. Additionally, Protected Pathways are posted in the Main Gatehouse, OCC Shift Turnover logs, and outage updates handed out at the Main Gatehouse. Dresden Stations Problem Identification Form (PIF) database has been reviewed and indicates there have been no further problems regarding the Protected Pathway program.
00-003	1/16/91	LER 91-002 Rev 1	Perform examination of 100% (92) of the closure studs on both Units 2 and 3 each refueling outage, using the enhanced ultrasonic end shot technique.	Perform examination of 100% (92) of the closure studs on Unit 2 reactor vessel each refueling outage using enhanced ultrasonic end shot technique.	Based on Corporate Programs review of Dresden Units 2 and 3 and Quad Cities Units 1 and 2, the physical properties of Unit 3's closure studs show that increased inspection frequency for ultrasonic examination is not warranted. This evaluation is documented per DG-00-00012 dated January 10, 2000. There is no potential adverse regulatory impact. Unit 3's reactor closure studs will be examined in accordance with ASME Section XI under Dresden's current inservice inspection (ISI) plan. Unit 2's reactor closure studs will continue to be inspected every refuel outage as originally committed in LER 91-002, Revision 1.

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00-004	2/10/00	NRC Inspection Report 50-237; 50-249/97009 (AR 15354-09) JSPLTR 97-0143	A station predefine will be created to change out the Alternate Standby Liquid Control (SBLC) containers on a five-year rotation.	Delete this commitment.	Quality of containers is adequately ensured by Dresden Operation Surveillance (DOS) 0010-15, Canister Integrity and Seal Inspection Verification; a separate commitment made to the NRC. This commitment ensures container quality and will determine when containers need to be changed.
00-005	4/17/00	LER 237-180-95-00502	Establish an accelerated LLRT schedule and check valve inspection plan in order to verify the success of the corrective actions undertaken in reducing the ACAD primary containment isolation check valve LLRT failures.	Revise LLRT schedule for ACAD primary containment isolation check valves from current requirement to test on an annual basis to a 30 month frequency as required by 10CFR50 Appendix J.	The ACAD primary containment isolation check valves has had an excellent history of minimum leakage for the past 5 years. The history of these valves over the past 5 years give no indication of degradation.
#00-006	5/3/00	JSPLTR 97-0187, Inspection Report 50-237/249/97017	DAP13-9 was revised to include a specific section which defined proper receipt and control of un-searched material. This revision included the creation of a form to be utilized to document the issuance and receipt of material.	DAP 13-9 is being replaced by SY-AA-101-123, Searching Vehicles and Cargo. This new procedure does not contain the form for documenting the issuance and receipt of material.	SY-AA-101-123, Section 4.3 gives concise guidance on control of un-searched material. This procedure allows for uniform fulfillment of search requirements at all five nuclear stations without using the form that had existed only at Dresden. Security and applicable stores personnel are trained on the requirements. Meeting the search requirements is not enhanced through the use of a form.
#00-007	5/3/00	JSPLTR 97-0053 Inspection Report 50-010, 237, 249/97002	Establish a method to conduct random verifications of status level assignments with personnel who can authorize station access to assure appropriate status levels have been issued. This was incorporated in DAP 13-01 and later in DAP 13-07.	Delete this commitment.	A change in 10CFR73.55 (d)(7)(2)(A) in December 1997 replaced the need for separate authorization lists of each vital area with a single list of all persons with access to any vital area. This means the granting of access to a single vital area can now allow access to all vital areas. Individuals are trained prior to receiving authorizing capability.

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#00-008	6/1/2000	LER 249-96-004	Establish a trending process of EWCS component data. The intent of the commitment was to develop a process through which failures on similar components could be identified and trended.	Trend component failure data through the maintenance rule and EPIX programmatic requirements. Eliminate the current monthly predefine to review EWCS correct work request data for component trends.	The original commitment was met by developing a FOCUS report to sort work requests for the past two years by component type and monthly predefine was established to have the Systems Engineering Performance Monitoring Group run the report and review it for adverse trends. This report and predefine are not effective means to identify repetitive failures or adverse trends. The current maintenance rule and EPIX programs provide more effective means of performing this type of trending. The maintenance rule and EPIX programs are more effective means to track component performance. These programs meet the objective of the original commitment.
#00-009	5/22/2000	IE Bulletin 80-07	Perform a visual (remote television) inspection of jet pump uppermost areas each refuel outage.	Perform jet pump inspections as described in BWRVIP-41. This document describes an ultrasonic examination each refuel outage of the beam assembly. It does not recommend a visual examination of the uppermost areas.	Since the 1980 Dresden jet pump failure and the subsequent IEB 80-07, there have been instances of degradation on other jet pump components at other BWR's. As a result, several GE SILS have been issued. BWR owners have implemented corrective action in varying degrees at each of their respective plants. The BWRVIP-41 updates these recommendations, captures industry experience, and presents a standardized recommendation for periodic inspection for all jet pump components susceptible to IGSCC and flow induced vibration. It does not recommend a visual examination of the beam assembly or other parts of the "uppermost areas" of the jet pumps.

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#00-010	6/9/2000	NRC Inspection Report 50-237/93007 and 249/93007	Dresden Radiation Protection (DRP)1520-13 will be revised to require the station laborer to initial checklist ensuring that all material that they loaded in the box is less than 25 mr/hr. This procedure will be revised by April 30, 1993.	Delete this commitment.	Dresden is replacing the procedure (DRP 5610-06) which currently holds the commitment, with a NGG procedure RP-AA-601, "Surveying Radioactive Material Shipments". The new procedure is used at all ComEd Nuclear Generation Group sites. This commitment was made due to a failure to follow written procedures. The shipment is still required to meet license restrictions of the receiver which are checked by the Radioactive Material Shipper during review of paperwork.