

**From:** [Mozafari, Brenda](#)  
**To:** [Mitchel.Mathews@exeloncorp.com](mailto:Mitchel.Mathews@exeloncorp.com)  
**Cc:** [Bowen, Jeremy](#); [Purnell, Blake](#)  
**Subject:** Dresden 2 & 3 Requests for additional information (RAIs) for RV-23H (ME9871-72) and RV-02C  
**Date:** Wednesday, February 27, 2013 3:54:00 PM  
**Attachments:** [Dresden 2 and 3 RAIs for RV-23H ME9871-72.doc](#)  
[Dresden 2 3 RAI for RR RV-02C \(3\).docx](#)

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Mitchel,

Below is the NRR staff's RAIs associated with your letter dated October 30, 2012, and the associated relief requests.

Let me know if you need a call to clarify any questions. We request a due date of April 1 to support the schedule.

**REQUESTS FOR ADDITIONAL INFORMATION (RAIs)  
EXELON GENERATION COMPANY, LLC  
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3  
RELIEF REQUEST RV-23H  
DOCKET NUMBERS 50-237 AND 50-249  
(TAC NOS. ME9871 AND ME9872)**

**RAI-RV-23H-1:**

In Relief Request RV-23H, Section 3, "Applicable Code Requirements", notes that relief is requested from the requirements of the American Society of Mechanical Engineers (ASME), *Code of Operation and Maintenance of Nuclear Power Plants* (OM Code), Paragraphs ISTC-3300, ISTC-3310, ISTC-5151(a), (b), and (c), and ISTC-5152. The ASME OM Code also provides inservice testing requirements for solenoid-operated valves in ISTC 5151(d) and ISTC-5153. Confirm that no relief is needed from ISTC-5151(d) and ISTC-5153.

**RAI-RV-23H-2:**

The Section 4.0, "Reason for Request," second paragraph states that, "Compliance with the quarterly exercising and stroke timing requirements of the Code would require either system modifications to replace these valves with ones of testable design, or to purchase non-intrusive test equipment and develop new test methods and procedures." Please explain why modifying the system by replacing these valves with a testable design or purchasing non-intrusive test equipment is not feasible (i.e. cost, planning or new method and procedure).

**RAI-RV-23H-3:**

Section 5.0, "Proposed Alternative and Basis for Use," does not provide any operational history (i. e. maintenance and reliability data) or note any failures of solenoid-operated valves 2-2301-032 and 3-2301-032. Please provide details of the operational history and

information regarding any failures of these valves for each unit. Also, describe how often the internals for these valves have been replaced or repaired and note any defects identified during maintenance activities, during the fourth ten-year inservice testing (IST) interval at Dresden 2 and 3.

#### **RAI-RV-23H-4**

The Section 5.0, second paragraph, under "Basis for Use," states, in part, that, "failure of these valves to perform their safety function would be indicated by the drain pot high level alarm operation with low pressure steam." (1) Please provide details of any consequences of failures of the 2(3)-2301-032 valves during normal and emergency operations, and (2) explain what actions and/or procedures are used if these valves fail to perform their safety function.

#### **RAI-RV-23H-5**

The Section 5.0, third paragraph, under "Basis for Use," states that, "Following discussions with the manufacturer regarding valve design and application, it was decided to disassemble, examine and repair or replace these valves every third operating cycle." Please provide (1) the basis for this activity to be performed every third operating cycle, and (2) the criteria for selecting between repair and/or replacement of the valve during this activity.

#### **RAI-RV-02C-1**

Will the alternative to ASME OM Code Mandatory Appendix I, Section I-1320, proposed by Relief Request RV-02C for testing of the Dresden Units 2 & 3 Main Steam Safety Valves (MSSVs) fully meet all requirements of ASME OM Code Case OMN-17? For instance, the referenced letter mentions compliance with OMN-17 paragraphs (a), (b), and (d) but contains no information regarding compliance with paragraphs (c) and (e).

**Brenda L. Mozafari**

Senior Project Manager, NRR/DORL  
U.S. Nuclear Regulatory Commission  
301-415-2020  
email: [brenda.mozafari@nrc.gov](mailto:brenda.mozafari@nrc.gov)

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**RAI-RV-23H-2:**

The Section 4.0, "Reason for Request," second paragraph states that, "Compliance with the quarterly exercising and stroke timing requirements of the Code would require either system modifications to replace these valves with ones of testable design, or to purchase non-intrusive test equipment and develop new test methods and procedures." Please explain why modifying the system by replacing these valves with a testable design or purchasing non-intrusive test equipment is not feasible (i.e. cost, planning or new method and procedure).

**RAI-RV-23H-3:**

Section 5.0, "Proposed Alternative and Basis for Use," does not provide any operational history (i. e. maintenance and reliability data) or note any failures of solenoid-operated valves 2-2301-032 and 3-2301-032. Please provide details of the operational history and

information regarding any failures of these valves for each unit. Also, describe how often the internals for these valves have been replaced or repaired and note any defects identified during maintenance activities, during the fourth ten-year inservice testing (IST) interval at Dresden 2 and 3.

#### **RAI-RV-23H-4**

The Section 5.0, second paragraph, under "Basis for Use," states, in part, that, "failure of these valves to perform their safety function would be indicated by the drain pot high level alarm operation with low pressure steam." (1) Please provide details of any consequences of failures of the 2(3)-2301-032 valves during normal and emergency operations, and (2) explain what actions and/or procedures are used if these valves fail to perform their safety function.

#### **RAI-RV-23H-5**

The Section 5.0, third paragraph, under "Basis for Use," states that, "Following discussions with the manufacturer regarding valve design and application, it was decided to disassemble, examine and repair or replace these valves every third operating cycle." Please provide (1) the basis for this activity to be performed every third operating cycle, and (2) the criteria for selecting between repair and/or replacement of the valve during this activity.

#### **RAI-RV-02C-1**

Will the alternative to ASME OM Code Mandatory Appendix I, Section I-1320, proposed by Relief Request RV-02C for testing of the Dresden Units 2 & 3 Main Steam Safety Valves (MSSVs) fully meet all requirements of ASME OM Code Case OMN-17? For instance, the referenced letter mentions compliance with OMN-17 paragraphs (a), (b), and (d) but contains no information regarding compliance with paragraphs (c) and (e).

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RELIEF REQUEST RV-02C  
DOCKET NUMBERS 50-237 & 50-249  
(TAC Nos. ME9865 & ME9866)**

**Reference:**

Letter from the Exelon Generation Company, LLC (Exelon), to the NRC, "Submittal of Relief Requests: Associated with Fifth Inservice Testing Interval," for Dresden Nuclear Power Station, Units 2 and 3, Docket Nos. 50-237 and 50-249, dated October 30, 2012 (Accession No. ML12305A532)

**RAI-RV-02C-1**

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