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Commonwealth Edison Company

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Dresden Nuclear Power Station
R. R. #1
Morris, Illinois 60435

November 27, 1970



Dr. Peter A. Morris, Director
Division of Reactor Licensing
U.S. Atomic Energy Commission
Washington, D.C. 20545

SUBJECT: LICENSE DPR-19 DRESDEN NUCLEAR POWER STATION UNIT 2, SECTION 6.6.C.1 OF THE TECHNICAL SPECIFICATIONS

The following information is submitted relative to fast closure time of the 203-1C inboard main steam isolation valve on October 27, 1970.

Problem & Initial Action

The unit was operating at about 370 MWe and quarterly surveillance testing of the Main Steam Isolation Valves (MSIV's) was in progress.

While surveillance testing the MSIV's, at 8:00 p.m. on October 27, 1970, it was found that valve 203-1C had a closure time of 2.0 sec., which is less than the normal range for closure time (3.0 to 5.0 sec.). On November 5, 1970, main steam line "C" was isolated. Valve 203-1C was closed at 10:26 a.m. and valve 203-2C was closed at 11:45 a.m. *N. Campbell*

Investigation and Corrective Action

Investigation of valve 203-1C, following plant shutdown on November 14, indicated that a loose oil fitting had allowed the escape of oil and thus caused the short closure time of the valve. The oil was replaced and the fitting tightened. The valve was reset to close within the normal range of 3 to 5 seconds.

Discussion

Technical Specification for timing of MSIV's, section 3.7.D.1 and Table 3.7.1 indicates the required maximum operating time of 5 seconds, but also indicates a range of operating time of 3 to 5 seconds. The purpose of establishing maximum closure times of automatic primary containment isolation valves as stated in the Bases (Section 3.7.A) is to minimize the

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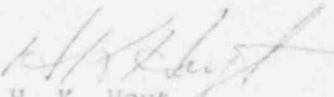
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November 27, 1970

potential leakage paths from the containment in the event of a loss of coolant accident. It was therefore concluded that the "Maximum Operating Time" as specified in Table 3.7.1 is exactly what is intended to meet the primary containment isolation function. General Electric Company was consulted respecting the 2 second operating time as related to the range of 3 to 5 seconds stated in Table 3.7.1. General Electric Company responded that this range is the normal range to which the closure time should be adjusted and that the 2 second time for one valve even with a 3 second average for the others was conservative for the analyzed pressure transient for the worst case containment isolation. General Electric Company also stated that the fast closure was of no concern respecting the integrity of the valve.

It was therefore concluded that MSIV operability as required in section 3.7.D.2 did exist even for the 2-second valve and that valve closure was not required. However, because of indicated concern by the AEC the matter was reviewed by the SRB and referred to the NRB on November 2, 1970. The NRB reported that its finding on November 5, 1970, was that the Station's consideration was in error. Therefore the 203-1C valve was immediately closed on November 5.



H. K. Hoyt
Superintendent

HKH:GLR:dmc