

March 2, 2005

Mr. Christopher M. Crane
President and Chief Nuclear Officer
Exelon Nuclear
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
NRC EVALUATIONS OF CHANGES, TESTS OR EXPERIMENTS,
AND PERMANENT PLANT MODIFICATIONS INSPECTION
REPORT 05000237/2005004(DRS); 05000249/2005004(DRS)

Dear Mr. Crane:

On February 11, 2005, the US Nuclear Regulatory Commission (NRC) completed combined baseline inspection of Evaluation of Changes, Tests, or Experiments, and Permanent Plant Modifications at the Dresden Nuclear Power Station, Units 2 and 3. The enclosed report documents the inspection findings, which were discussed on February 11, 2005, with Mr. D. Wozniak and other members of your staff at the completion of the inspection.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel.

On the basis of the results of the inspection, no findings of significance were identified.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA by Julio Lara Acting for/

David E. Hills, Chief
Materials Engineering Branch
Division of Reactor Safety

Docket Nos. 50-237; 50-249
License Nos. DPR-19; DPR-25

Enclosure: Inspection Report 05000237/2005004(DRS);
05000249/2005004(DRS)

See Attached Distribution

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Dresden Nuclear Power Station Plant Manager
Regulatory Assurance Manager - Dresden
Chief Operating Officer
Senior Vice President - Nuclear Services
Senior Vice President - Mid-West Regional
Operating Group
Vice President - Mid-West Operations Support
Vice President - Licensing and Regulatory Affairs
Director Licensing - Mid-West Regional
Operating Group
Manager Licensing - Dresden and Quad Cities
Senior Counsel, Nuclear, Mid-West Regional
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Illinois Department of Nuclear Safety
State Liaison Officer
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cc w/encl: Site Vice President - Dresden Nuclear Power Station
Dresden Nuclear Power Station Plant Manager
Regulatory Assurance Manager - Dresden
Chief Operating Officer
Senior Vice President - Nuclear Services
Senior Vice President - Mid-West Regional
Operating Group
Vice President - Mid-West Operations Support
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U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Docket Nos: 50-237; 50-249
License Nos: DPR-19; DPR-25

Report No: 05000237/2005004(DRS); 05000249/2005004(DRS)

Licensee: Exelon Generation Company

Facility: Dresden Nuclear Power Station, Units 2 and 3

Location: 6500 North Dresden Road
Morris, IL 60450

Dates: February 7 through February 11, 2005

Inspectors: Z. Falevits, Senior Reactor Inspector, Lead
G. O'Dwyer, Reactor Inspector
M. Munir, Reactor Inspector

Approved by: D. E. Hills, Chief
Materials Engineering Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000237/2005004(DRS); 05000249/2005004(DRS); 02/07/2005 - 02/11/2005; Dresden Nuclear Power Station, Units 2 and 3; Evaluation of Changes, Tests, or Experiments (10 CFR 50.59) and Permanent Plant Modifications.

This report covers a one-week announced baseline inspection on evaluations of changes, tests, or experiments, and permanent plant modifications. The inspection was conducted by three Region III inspectors. No findings of significance were identified.

The NRC's Program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

A. Inspector-Identified and Self-Revealed Findings

No findings of significance were identified.

B. Licensee-Identified Violations

None.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstones: Initiating Events, Mitigating Systems, and Barrier Integrity

1R02 Evaluations of Changes, Tests, or Experiments (71111.02)

.1 Review of 10 CFR 50.59 Evaluations and Screenings

a. Inspection Scope

From February 7 through 11, 2005, the inspectors reviewed eight evaluations performed pursuant to 10 CFR 50.59. The evaluations related to permanent plant modifications, setpoint changes, procedure changes, conditions adverse to quality, and changes to the updated final safety analysis report. The inspectors reviewed the evaluations to verify that the evaluations were thorough and that prior NRC approval was obtained as appropriate. The inspectors also reviewed 14 screenings where the licensee had determined that a 10 CFR 50.59 evaluation was not necessary. In regard to the changes reviewed where no 10 CFR 50.59 evaluation was performed, the inspectors verified that the changes did not meet the threshold to require a 10 CFR 50.59 evaluation. These evaluations and screenings were chosen based on risk significance of samples from the different cornerstones. The list of documents reviewed by the inspectors is included as an attachment to this report.

The inspectors used, in part, Nuclear Energy Institute (NEI) 96-07, "Guidelines for 10 CFR 50.59 Implementation," Revision 1, to determine acceptability of the completed evaluations and screenings. The NEI document was endorsed by the NRC in Regulatory Guide 1.187, "Guidance for Implementation of 10 CFR 50.59, Changes, Tests, and Experiments," dated November 2000. The inspectors also consulted Part 9900 of the NRC Inspection Manual, "10 CFR Guidance for 10 CFR 50.59, Changes, Tests, and Experiments."

b. Findings

No findings of significance were identified.

1R17 Permanent Plant Modifications (71111.17B)

a. Inspection Scope

From February 7 through 11, 2005, the inspectors reviewed 10 permanent plant modifications that had been installed in the plant during the last two years. The modifications were chosen based upon their effect on systems that had high probabilistic risk analysis (PRA) significance in the licensee's Individual Plant Evaluation (IPE) or high maintenance rule safety significance. The inspectors reviewed the modifications to verify that the completed design changes were in accordance with the specified design requirements and the licensing bases and to confirm that the changes

did not affect any systems' safety function. Design and post-modification testing aspects were verified to ensure the functionality of the modification, its associated system, and any support systems. The inspectors also verified that the modifications performed did not place the plant in an increased risk configuration.

The inspectors also used applicable industry standards to evaluate acceptability of the modifications. The list of documents reviewed by the inspectors is included as an attachment to this report.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA2 Identification and Resolution of Problems

.1 Routine Review of Condition Reports

a. Inspection Scope

From February 7 through 11, 2005, the inspectors reviewed 10 condition reports that were written by licensee personnel to enter the issues in the corrective action program. The inspectors reviewed these findings to verify an appropriate threshold for identifying issues and to evaluate the effectiveness of corrective actions related to the permanent plant design and evaluations for Changes, Tests, or Experiments issues. In addition, two condition reports, written on issues identified during the inspection, were reviewed to verify adequate problem identification and incorporation of the problems into the corrective action system. The specific corrective action documents that were sampled and reviewed by the team are listed in the attachment to this report.

b. Findings

No findings of significance were identified.

4OA6 Meetings

.1 Exit Meeting

The inspectors presented the inspection results to Mr. D. Wozniak and other members of licensee management on February 11, 2005. The licensee acknowledged the inspection results presented. Licensee personnel were asked to identify any documents, materials, or information provided during the inspection that were considered proprietary. No proprietary information was identified.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

D. Wozniak, Plant Manager
D. Galanis, Design Engineering Manager
M. Kanavos, Site Engineering Director
R. Gadbois, Operations Director
J. Bashor, Work Management Director
P. Salas, Regulatory Assurance Manager
C. Symonds, Training Director
B. Rybak, Lead Licensing Engineer

Nuclear Regulatory Commission

D. Tharp, Resident Inspector (Clinton)

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened and Closed

None.

Discussed

None.

LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections or portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

Calculations Reviewed

8982-13-19-6; Second Level Undervoltage Relay Setpoint - Unit 2; Revision 4a

8982-17-19-2; Second Level Undervoltage Relay Setpoint - Unit 3; Revision 3a

Condition Reports Initiated as a Result of the Inspection

AR 00300333; Observations Identified During NRC Mod/50.59 Inspection; dated February 9, 2005

AR 00300344; NRC Identified Drawing Discrepancies; dated February 11, 2005

Condition Reports (CRs/ARs) Reviewed

AR 00173179; SSDI Identifies Potential HPCI Design Inadequacy; dated August 26, 2003

AR 00179698; Walkdowns Reveal D3 Squg Mod Can't Be Done Online; dated October 2, 2003

AR 00180191; New Cubicles Did Not Match the CAT ID Descriptions on 6 of the 13 CAT Numbers Received; dated October 9, 2003

AR 00181505; Inadequate Pre-fab Piping Design; dated October 16, 2003

AR 00182151; Wrong Fuse Block Specified for SLMS Modification; dated October 21, 2003

AR 00184635; NOS/QV Rejected Unit 3 SQUG Modification; dated November 4, 2003

AR 00185113; HPCI Relay Does Not Meet Specification; dated November 11, 2003

AR 00185509; At 902-3 Whenever the HPCI TURB TRIP Reset Pushbutton Is Depressed with Oil System Off, SV8 (stop valve reset Solenoid) Energizes and Remains Energized after Pushbutton Is Released; dated November 08, 2003

AR 00194561; TR 86 MOD Incomplete; dated January 12, 2004

CR 175568; Unresolved Safety Question Relating to HPCI HELB; dated September 12, 2003

Design Drawings

12E-3527, Sheet 1; Schematic Diagram, High Pressure Coolant Injection System Sensors and Auxiliary Relays; Revision AQ

12E-3527, Sheet 3; Schematic Diagram, High Pressure Coolant Injection System Sensors and Auxiliary Relays; Revision AN

12E-3699; Wiring Diagram, Main Control Board 903-3; Revision CD

12E-3758B; Wiring Diagram, Panel 903-33, Part 1; Revision AL

12E-3762B; Wiring Diagram, Panel 903-39, Part 2; Revision AK

12E-3762C; Wiring Diagram, Panel 903-39, Part 3; Revision AB

12E-3762D; Wiring Diagram, Panel 903-39, Part 4; Revision AD

12E-3770B; Wiring Diagram, Reactor Instr. and Protection Instr. Rack 2203-6, Section B; Revision M

Modifications (Design Changes)

EC 6602; Install U3 Core Spray Lower Sectional Replacement; dated November 20, 2004

EC 330522; Replace Existing Transformer No. 29 with New Style; Revision 0

EC 337568; Reactor Feed Pump Oil Pressure Trip-Modify to 2 Out of 2 Logic, Relocate 9 Pressure Switches at RFP Skids; Revision 1

EC 338061; Replace D3 250 Vdc Ground Detection Recorder/Contact Making Voltmeter, EIR-3-8340-250, with a Paperless Recorder; Revision 0

EC 340723; Installation of 138 kV TR 86 Voltage Improvement for RAT 22; dated January 27, 2003

EC 340795; Repair Jet Pump 9 at Leaf to Block Weld and Install Clamps on Other Braces; Revision 1

EC 344560; Modify Unit 3 HPCI Turbine Restart Logic; dated December 15, 2003

EC 345001; Replace One of Two 2C RFP Phase 'B' Cables Due to Failure; Revision 1

EC 347810; EDG Fuel Oil Pump Replacement and Flex Hose Installation - Unit 2/3; Revision 0

EC 349539; Replacement of TR32 Transformer; Revision 3

Operators Work Around/Operators Challenges

No. 42; Dresden Unit 3 has Low Switchyard Voltages; dated June 15, 2004

No. 5; Lift Station Breaker Problems; dated September 27, 1999

Procedures

CC-AA-102; Design Input and Configuration Change Impact Screening; Revision 9

CC-AA-103; Configuration Change Control; Revision 8

CC-AA-103-2001; Setpoint Change Control; Revision 1

CC-AA-107; Configuration Change Acceptance Testing Criteria; Revision 4

CC-AA-107-1001; Post Modification Acceptance Testing; Revision 0

LS-AA-104; Exelon 50.59 Review Process; Revision 4

LS-AA-104-1000; Exelon 50.59 Resource Manual; Revision 1

LS-AA-107; UFSAR Update Procedure; Revision 2

OP-AA-102-103; Operator Work-Around Program; Revision 1

10 CFR 50.59 Evaluations

2003-03-005; Installation of New 138 kV Feed to Dresden Unit 2 138 kV Reserve Auxiliary Transformer 22 (RAT 22); Revision 1

2004-02-01; EC 348970 and TRP 04-015 Heavy Load Rigging Plans; Revision 1

2004-02-002; Potential HPCI Water Intrusion During Transients and Accidents; dated May 4, 2004

2004-03-004; Dresden 3B Reactor Recirculation Pump Motor and Rotating Element Move (TRP-04-020); Revision 0

2004-03-007; Install U3 Core Spray Lower Sectional Replacement EC6602; Revision 1

2004-03-008; Revise the U3 (U3) Recirculation Pump Speed Control Circuit for Open Loop Operation; Revision 000

2004-07-001; Disable the Main Turbine High Vibration Trip for Unit 2 and Unit 3 at the Turbine Supervisory Instruments Panel; Revision 0

2004-04-010; Defeat 2D Moisture Separator Automatic Turbine Trip; Revision 0

10 CFR 50.59 Screenings

2003-0321; Replace One of Two 2C RFP Phase 'B' Cables Due to Failure; Revision 1

2003-0413; Reactor Feed Pump (RFP) Lube Oil Pressure Trip (Modify to 2 out of 2 Logic, and Replace Pressure Switches; Revision 0

2003-0420; Replace Six Fuses in 250 Vdc Bus 3, Cubicle B1 for Battery Charger Control Circuit; Revision 0 2004-008; DG FO Pump and Piping Replacement; Revision 0

2004-008; DG FO Pump and Piping Replacement; Revision 0

2004-0075; 250 Vdc Electrical System; Revision 0

2004-0119; Low Switchgear Voltage; Revision 0

2004-0127; Second-Level Undervoltage Relay Setpoint Calculation; Revision 0

2004-0157; Place 4160 V Bus Feed Breakers in Pull to Lock in DGA 12; Revision 0

2004-0186; Manual Operation of TR 86 TLC to Adjust Voltage Supplied to TR-22; dated June 4, 2004

2004-0330; Revise DOP 6500-30 to Remove Steps That Allow Both Unit's Div 1 Emergency Buses to be Supplied from DG 2/3; Revision 0

2004-0379; Install Restrainer Bracket Aux Wedge(s) for U3 Jet Pump(s) EC 351973; Revision 0

Screen for ATI 00204690-04; Potential HPCI Steam Line Water Intrusion; Revision 1

Screen for EC/DCP 6602; Unit 3 CSL Replacement; dated November 16, 2004

Screen for EC 348970 and TRP 04-015; Rigging for 2A RR Motor Move; Revision 1

Miscellaneous Documents

Technical Specification Section 3.3; Instrumentation; Amendment No. 185/180

Technical Specification Section 3.5; Emergency Core Cooling System (ECCS) and Isolation Condenser (IC) System; Amendment No. 188/183

LIST OF ACRONYMS USED

ADAMS	Agencywide Documents Access and Management System
CFR	Code of Federal Regulations
DRS	Division of Reactor Safety
IP	Inspection Procedure
IPE	Individual Plant Evaluation
IR	Inspection Report
NEI	Nuclear Energy Institute
NRC	United States Nuclear Regulatory Commission
PRA	Probabilistic Risk Analysis
SDP	Significance Determination Process