

March 14, 1983

Docket Nos. 50-237/249
LS05-83-03-028

Mr. D. Farrar
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Farrar:

DISTRIBUTION

Docket	ELJordan
NRC PDR	JMTaylor
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SUBJECT: ORDER CONFIRMING LICENSEE COMMITMENTS ON POST-TMI RELATED ISSUES
(GENERIC LETTERS 82-05 AND 82-10)

Dresden Nuclear Power Station, Units 2 and 3

The Commission has issued the enclosed Order confirming your commitments to implement those post-TMI related items set forth in NUREG-0737 for which the staff requested completion on or after July 1, 1981. This Order is based on commitments contained in your letters responding to the NRC's Generic Letters 82-05 and 82-10 dated March 17, 1982 and May 5, 1982, respectively.

The Order references your letters and, in its Attachments, contains lists of the applicable NUREG-0737 items with your schedular commitments. As discussed in the Order, several of the items listed in Generic Letter 82-10 will be handled outside of this Order.

The Commission's intention when it issued NUREG-0737 was that items would be completed in accordance with the staff's recommended schedule. However, our evaluation of your proposed schedule exceptions concludes that the proposed delays are acceptable. Among other things, the Order requires implementation of these items in accordance with your proposed schedule.

Some of the items set forth in the Attachments to the Order are subject to post implementation review and inspection. Our post implementation review and/or the development of Technical Specifications may identify alterations to your method of implementing and maintaining the requirements. Any identified alterations will be the subject of future correspondence.

*SE01
DSU USE(16)*

OFFICE
SURNAME
DATE	8303220362 PDR ADOCK	830314 05000237 PDR

Mr. D. Farrar

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March 14, 1983

A copy of this Order is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by/

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing

Enclosure:
Order

cc w/enclosure:
See next page

OFFICE ▶	DL: ORB#5	DL: ORB#5	DL: ORAB T. P. G. 170	OELD	DL: ORB#5	DL: AD-SA	DL: DLR
SURNAME ▶	H. Smith:ajs	R. Gilbert	T. P. G. 170	h. day	D. Crutchfield	F. M. MagVia	D. Eisenhut
DATE ▶	03/24/83	03/14/83	03/4/83	03/4/83	03/4/83	03/4/83	03/14/83

Mr. D. Farrar

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March 14, 1983

cc
Isham, Lincoln & Beale
Counselors at Law
One First National Plaza, 42nd Floor
Chicago, Illinois 60603

Mr. Doug Scott
Plant Superintendent
Rural Route #1
Morris, Illinois 60450

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
RR #1
Morris, Illinois 60450

Chairman
Board of Supervisors of
Grundy County
Grundy County Courthouse
Morris, Illinois 60450

Illinois Department of Nuclear Safety
1035 Outer Park Drive, 5th Floor
Springfield, Illinois 62704

U. S. Environmental Protection Agency
Federal Activities Branch
Region V Office
ATTN: Regional Radiation Representative
230 South Dearborn Street
Chicago, Illinois 60604

James G. Keppler, Regional Administrator
Nuclear Regulatory Commission, Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
COMMONWEALTH EDISON COMPANY) Docket Nos. 50-237/249
(Dresden Nuclear Power Station,)
Units 2 and 3))

ORDER CONFIRMING LICENSEE COMMITMENTS
ON POST-TMI RELATED ISSUES

I.

Commonwealth Edison Company (CECo or the licensee) is the holder of Provisional Operating License No. DPR-19 and Facility Operating License No. DPR-25 which authorize the operation of the Dresden Nuclear Power Station, Units 1 and 2 (Dresden or the facilities) at steady-state power levels not in excess of 2527 megawatts thermal for each unit. The facilities are boiling water reactors located at the licensee's site in Grundy County, Illinois.

II.

Following the accident at Three Mile Island Unit No. 2 (TMI-2) on March 28, 1979, the Nuclear Regulatory Commission (NRC) staff developed a number of proposed requirements to be implemented on operating reactors and on plants under construction. These requirements include Operational Safety, Siting and Design, and Emergency Preparedness and are intended to provide substantial additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and

schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion,
- (2) For items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and
- (3) Justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

Commonwealth Edison Company responded to Generic Letter 82-05 by an initial letter dated April 15, 1982 and subsequently by letters dated June 1 and 11, July 8, August 5, September 2 and 3, October 4 and 14, and December 20 and 29, 1982 and January 14, 1983. The licensee responded to Generic Letter 82-10 by an initial letter dated June 4, 1982 and subsequently by letters dated June 28, September 20 and 22, October 15, and December 28 and 29, 1982 and January 6 and 14, 1983. In these submittals, the licensee confirmed that some of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables (Attachments 1 and 2) summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

There are several items in Generic Letter 82-10 that, as noted in Attachment 2, have licensee schedules which are yet to be determined. These items are, therefore, not included in this Order. The licensee considers some of the items addressed in this Order to be completed or to require no modifications. These items are so noted in Attachments 1 and 2. The staff's evaluation of the licensee's delay for implementation of the remaining item is provided herein.

III.D.3.4 Control Room Habitability

The licensee's control room habitability study was completed and originally submitted in September 1981. Additional information was

provided in December 1981 and June 1982. The modifications called for in the study are underway. Based on current information, the licensee has committed to completion of the modification by January 1, 1984. The modifications are subject to a post-implementation review by the staff.

For Dresden, there are three items from Generic Letter 82-05 that are incomplete, II.F.1.(1), II.F.1.(2) and II.F.1.(6). All others are, in the staff's view, complete. The staff evaluation of the incomplete items, including compensatory measures, is as follows:

II.F.1.(1) Install Noble Gas Effluent Monitors

This item is delayed because of continuing difficulties by the licensee to develop an accurate correlation of the instrument reading to plant release. Purchase of a new source and further tests are required. CECO now projects that the completion date for this effort is July 1, 1983. In the interim, as a compensatory measure, the already installed SPING-4 monitors will be used. When possible the existing Main Chimney and Reactor Building ventilation exhaust noble gas monitor can be used as a back-up.

II.F.1.(2) Monitoring for Iodine in Post-Accident Releases

This item has been delayed due to vendor delivery problems. The latest information from the licensee is that they still expect delivery from the vendor in time to meet their installed and operable date of

July 1, 1983. In the interim, as a compensatory measure, the licensee has installed and is operating an Eberline SPING-4 High Range Noble Gas Monitoring System which incorporates three noble gas monitoring channels (low, medium and high) and particulate and iodine filters all on one skid.

II.F.1.(6) Provide Continuous Monitoring of H₂ in Containment

This item is delayed because of licensee difficulties in procuring environmentally and seismically qualified hydrogen monitoring equipment. Based on current information, the licensee believes that properly qualified equipment can be delivered by September 1983 and made operable by December 31, 1983. In the interim, as a compensatory measure, the containment atmospheric monitor in the High Range Sample System will be relied on for hydrogen indication.

We find, based on the above evaluation, that: 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the delays; and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and, therefore, the licensee's commitments should be confirmed by Order.

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IV.

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described in the Attachments to this Order in the manner described in the licensee's submittals noted in Section III herein no later than the dates in the Attachments.

V.

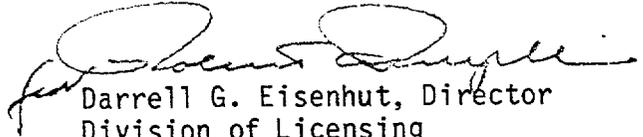
The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR A HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order.

This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland,
this 14 day of March,
1983.

Attachments:

1. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-05
2. Licensee's Commitments on Applicable NUREG-0737 Requirements from Generic Letter 82-10

DRESDEN STATION, UNITS 2 AND 3

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)
I.A.3.1	Simulator Exams	10/01/81	Include simulator exams in licensing examinations	Complete
II.B.2	Plant Shielding	01/01/82	Modify facility to provide access to vital areas under accident conditions	Complete
II.B.3	Post-Accident Sampling	01/01/82	Install upgrade post-accident sampling capability	Complete
II.B.4	Training for Mitigating Core Damage	10/01/81	Complete training program	Complete
II.E.4.2	Containment Isolation Dependability	07/01/81	Part 5-lower containment pressure setpoint to level compatible w/normal operation.	Complete
		07/01/81	Part 7-isolate purge & vent valves on radiation signal	Complete
II.F.1	Accident Monitoring	01/01/82	(1) Install noble gas effluent monitors.	07/83
		01/01/82	(2) Provide capability for effluent monitoring of iodine	07/83
		01/01/82	(3) Install incontainment radiation-level monitors	Complete
		01/01/82	(4) Provide continuous indication of containment pressure	Complete
		01/01/82	(5) Provide continuous indication of containment water level.	Complete
		01/01/82	(6) Provide continuous indication of hydrogen concentration in containment.	12/83

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-05

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)
II.K.3.15	Isolation of HPCI & RCIC Modification	07/01/81	Modify pipe break detection logic to prevent inadver- tent isolation	Complete
II.K.3.24	Space Cooling for HPCI/RCIC	01/01/82	Confirm adequacy of space cooling for HPCI/RCIC	Complete
II.K.3.27	Common Reference Level	07/01/81	Provide common Reference Level for Vessel Level Instrumentation	Complete

LICENSEE'S COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS FROM GENERIC LETTER 82-10

Item	Title	NUREG-0737 Schedule	Requirement	Licensee's Completion Schedule (or status)
I.A.1.3.1	Limit Overtime	10/01/82 per Gen Ltr 82-12 dtd. 6/15/82	Revise administrative proce- dures to limit overtime in accordance w/NRC Policy Statement issued by Generic Ltr. No. 82-12, dtd 6/15/82	Complete
I.A.1.3.2	* Minimum Shift Crew	To be super- seded by Pro- posed Rule	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units	To be addressed when Final Rule is issued.
I.C.1	* Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
II.D.1.2	RV and SV Test Programs	10/01/82	Submit plant specific reports on relief valve and safety valve program.	Complete
II.K.3.18	ADS Actuation	09/30/82	Submit revised position on need for modifications	Complete
II.K.3.30 & 31	* SBLOCA Analysis	1 year after staff approval of model	Submit plant specific analyses	To be determined following staff approval of model
III.A.1.2	* Staffing Levels for Emergency Situations	Superseded by 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be Determined
III.A.1.2	* Upgrade Emergency Support Facilities	" " "	" " " "	" " "
III.A.2.2	* Meteorological Data	" " "	" " " "	" " "
III.D.3.4	Control Room Habitability	To be deter- mined by licensee	Modify facility as identified by licensee study.	01/84

* Not Part of Confirmatory Order.