Regulatory File Cy.

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Commonwealth Edison Company

ONE FIRST NATIONAL PLAZA ★ CHICAGO, ILLINOIS

Address Reply to:

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May 6, 1971

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

Dear Dr. Morris:

In a letter dated February 8, 1971, you stated to us your position concerning the inerting of the primary containment at Dresden Unit 2. Your position was that the primary containment should be inerted prior to the warranty run and subsequently when electric output was being delivered to the system grid for periods in excess of 24 hours.

The purpose of this letter is to indicate to you our plans for inerting the primary containment of Dresden Unit 2 and the start-up test program to be done following the current fuel replacement outage.

Following criticality and heat-up to 1000 pounds, the turbine will be balanced. This operation will require approximately two days and will be done at power levels between 10% and 20% of rated. During the turbine balancing operation an inspection will be made inside the drywell of the recirculation pump seals and piping hangers. Since these latter inspections require entry into the drywell and since we will not be delivering electrical output to the system grid for a period in excess of 24 hours, the primary containment will not be inerted. Following completion of the turbine balancing work and the inspections and prior to synchronizing the generator to the system, the primary containment will be inerted and will remain inerted for the rest of the start-up test program unless entry into the drywell is required for maintenance.

Following synchronization to the system, reactor power level will be raised to 50% with 100% recirculation flow. After a heat balance and APRM calibration, the following tests will be conducted: a pressure regulator set point change, flux response to control rods, control rod calibration, and a level control set point change. In addition to the above, a trip of the feedwater pump and a 10% load increase with control rods will be done. Upon completion of this testing, the power level will be raised to 75% and a heat balance, LPRM and APRM calibration will be performed. After completion of the above, the power level will be increased to 100% and after a heat balance and APRM calibration, the following tests will be conducted: a pressure regulator set point change, flux response to control rods,

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control rod calibration, and a level set point change. In addition, a feedwater pump trip will again be performed at this power level. Upon completion of the above, several stability type tests, such as the opening and closing of a bypass valve, level control set point change, and flow control set point change, will be made while running with one recirculation pump in operation at speeds of 100% and 30%. Following these tests, several tests to verify the capability of the flow control system to accept step and ramp changes will be performed. Upon completion of these latter tests, the 100% power and 100% flow conditions will be established and a heat balance and APRM calibration performed. Following these checks, the seven day warranty run will be made.

We would like to reiterate again that during the turbine balancing operations, the primary containment will not be inerted. However, following these operations, the primary containment will be inerted unless it becomes necessary to enter the primary containment. If you have any questions concerning the above, please let us know.

Very truly yours,

Byron Lee Jr.

Byron Lee, Jr.
Assistant to the President

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