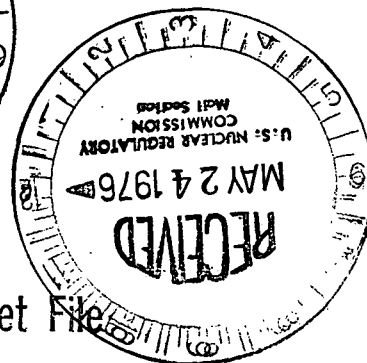
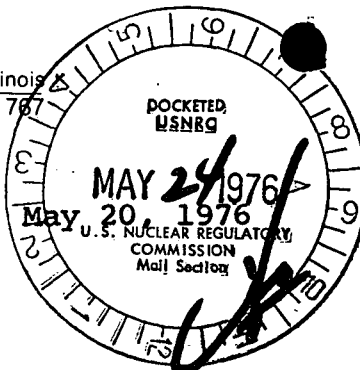




Commonwealth Edison

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Mr. Dennis L. Ziemann, Chief
Operating Reactors - Branch 2
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Regulatory Docket File

Subject: Dresden Station Units 2 and 3
Redundant Trolley Installation Waiver
Request for Fuel Shipments for
Dresden Station, NRC Docket Nos.
50-237 and 50-249

Dear Mr. Ziemann:

The shipment of spent fuel to the General Electric Midwest Fuel Recovery Plant (MFRP) from Dresden Station using G.E. IF-300 casks is presently scheduled to begin in the first week of June. A total of 689 spent fuel assemblies are to be shipped, thus demanding that the campaign proceed until the Dresden Unit 3 outage scheduled for August 30, 1976. If the schedule is delayed, it is unlikely that all of the intended shipments will be made. These 689 fuel assemblies are the remainder of the fuel assemblies described in Dresden Station Special Report No. 28. The NRC has authorized shipment of these fuel assemblies prior to the installation of the redundant crane; however, the redundant crane described in Dresden Station Special Report No. 41 will be used for these shipments with certain modifications described below.

You are requested to grant a temporary waiver of the installation of the redundant upper limit switch to which we have committed as a part of our reactor building crane modifications at Dresden Station. This switch, which is redundant to the three other switches now installed to preclude two-blocking, will interrupt the power to the main hoist motor. Justification of this request is contained in Item 1 below. This waiver is required by June 1, 1976 to allow fuel shipments to proceed on schedule.

In addition, two other aspects of the cask handling system will be modified from the system described in Special Report No. 41. Administrative controls described in Item 2 will be used as an alternate to the automated restricted path control system, and the

5214

Mr. Dennis L. Ziemann

- 2 -

May 20, 1976

main hoist motor will be used as described in Item 3 in lieu of the slow speed drive. These modifications were necessary, because the path control has not yet been qualified by testing and the slow speed motor requires modifications before it is accepted for service. Since the intent of the original design will be maintained with these two (2) modifications, they will be implemented without NRC approval.

Item 1 (Knife Switch)

As has been indicated in previous correspondence, it is our intention to install an additional upper limit switch to trip the power to the main hoist motor in the event the prescribed main block travel limit is exceeded. However, due to engineering availability problems and equipment delivery problems experienced by the supplier of this switch (Whiting Corporation), it will not be possible to install the switch earlier than July 16, 1976. Inasmuch as we have scheduled spent fuel shipments to begin before that date, we request that these shipments be allowed to proceed prior to the installation of the additional upper limit switch.

In order to provide the necessary assurance that the system as currently installed will provide the required redundancy, the three load block upper limit switches now in service will be tested prior to the first cask handling to demonstrate operability. In addition, during cask handling, an operator in communication with the crane operator and with personnel directing crane operation will be stationed at the main breaker supplying feed to the 125-ton crane. Instructions will be given to this operator to cut all power to the crane in the event of an equipment malfunction causing the cask to be hoisted above the six-inch limit.

Item 2 (Path Control)

The operability of the restricted path for the shipping cask has not been confirmed. The crane modifications of which this is a part were suspended due to the necessity of starting the refueling outage on Dresden Unit 2. The crane will not be available for restricted path testing until May 21, 1976, which may not provide the time necessary to qualify the system for use prior to cask handling operations in June 1976. Therefore, the administrative controls identified in Item 1 above will be imposed to insure that the cask will not deviate from the intended path. This procedure has been followed during previous uses of the IF-300 cask. The procedure requires close supervision of all operations to insure that the approved route is followed. Moreover, in view of the fact that the hoist

Mr. Dennis L. Ziemann

- 3 -

May 20, 1976

system has been modified to provide the redundancy necessary to preclude a cask drop accident, the necessity of an automated cask path control system is lessened. The automated control system will, however, be used as soon as it has been qualified since it is expected to greatly simplify cask handling supervision.

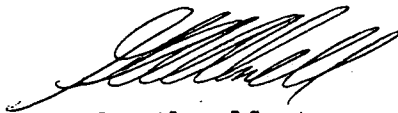
Item 3 (Slow Speed Motor)

It was indicated in answers to NRC questions submitted on February 9, 1976, that the redundant crane installation would include a slow speed drive motor especially for use in handling the 100-ton cask. This motor would provide for hoisting within the speed limitations previously established and subsequently set forth in Regulatory Guide 1.104. Inasmuch as we have experienced problems with our slow speed motor installation in preliminary testing and limited use, and work to correct these problems cannot be completed prior to the scheduled commencement of the fuel shipment campaign, we propose to utilize the main hoist for cask handling with certain circuit modifications. These circuit modifications will limit the maximum attainable hoisting speed of the main hoist to the five-foot-per-minute limit intended for cask handling. Such circuit modifications were performed on the previous (non-redundant) crane installation and proved satisfactory during previous cask handling experiences.

Please contact this office if there are any additional questions.

One (1) signed original and 39 copies are provided for your use.

Very truly yours,



G. A. Abrell
Nuclear Licensing Administrator
Boiling Water Reactors