



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

US NRC
 DISTRIBUTION SERVICES
 BRANCH

1980 DEC 30 PM 5 14

RECEIVED DISTRIBUTION
 SERVICES UNIT

December 24, 1980

Mr. Harold R. Denton, Director
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Subject: Dresden Station Unit 2
 Confirmatory Order to Install
 Recirculation Pump Trip
NRC Docket No. 50-237

References (a): H. R. Denton letter to D. L. Peoples
 dated February 21, 1980

(b): R. F. Janecek letter J. G. Keppler dated
 July 18, 1980

Dear Mr. Denton:

Reference (a) transmitted a Confirmatory Order for Dresden Station Unit 2 to install a recirculation pump trip by December 31, 1980, or place the facility in the cold shutdown or refueling mode of operation.

By this letter, Commonwealth Edison requests an amendment of the Confirmatory Order which extends the required date of the order to January 4, 1981 for the Dresden Unit 2 facility.

Due to manpower problems associated with the holiday (New Year's Day) and the subsequent weekend, substantial critical path time will be lost during the first four days of the scheduled refueling outage if shutdown by December 31, 1980 is required. Existing union agreements concerning holiday and overtime work will prevent efficient manning of critical path jobs during the first four outage days.

Our bases for the proposed extension are as follows:

1. The probability of an ATWS event occurring is extremely small, making the impact of the four day extension negligible.
2. Dresden 2 is currently near the end of a coastdown cycle, and the maximum attainable power level is 45.5% of rated power. This value will decrease as the coastdown progresses. As indicated in Reference (b), at power levels less than 81.5% of rated power the

A001
 s
 1/0

8012310 282

P

Mr. Harold R. Denton, Director
December 23, 1980
Page 2

recirculation pump trip feature is not required to maintain peak vessel pressures below the 1500 psig limit during ATWS events.

Based on the above, we believe that extending the required implementation date from December 31, 1980 to January 4, 1981 will have no significant impact on the health and safety of the public or plant personnel.

Please respond to this request for extension at your earliest possible convenience.

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

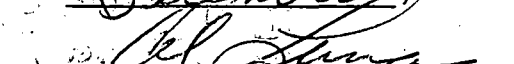
Very truly yours,



C. Reed
Vice-President

cc: RIII Inspector, Dresden

SUBSCRIBED and SWORN to
before me this 24TH day
of December, 1980



Notary Public