Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 9, 1991

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Response to Supplemental Safety Evaluation
for Station Blackout
NRC Docket Nos. 50-237/249 and 50-254/265

References: (a) B. Siegel (NRC) letter to T. Kovach (CECo), dated December 11, 1990.

(b) M. Richter (CECo) letter to T. Murley (NRC), dated February 15, 1991.

(c) L. Olshan (NRC) letter to T. Kovach (CECo), dated July 18, 1991.

Dear Dr. Murley:

Reference (a) transmitted the safety evaluations to the Station Blackout (SBO) rule, 10 CFR 50.63, for Dresden and Quad Cities Stations. These safety evaluations presented several recommendations which Commonwealth Edison Company (CECo) was requested to address. CECo's response to the recommendations was presented in Reference (b), and a supplemental safety evaluation (for Dresden and Quad Cities Stations) was issued on that response in Reference (c). Reference (c) also requested that CECo provide schedule information for certain recommendations. This letter presents that information. Additionally, this letter presents a revised schedule for completion of the SBO procedure revisions and implementation of the emergency diesel generator reliability program.

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CECo indicated in Reference (b) that the following safety evaluation recommendations for Dresden and Quad Cities Stations would be addressed and the supporting documentation would be retained in the SBO files.

- **Dresden Safety Evaluation Section 2.3.1**

  The licensee should verify that the diesel-driven fire pump(s) will have clog-free river water suction and sufficient NPSH to supply isolation condenser makeup.

- **Dresden and Quad Cities Safety Evaluation Section 2.3.4**

  (1a) The licensee should address the discrepancy between the 1-hour temperature and the steady state temperature calculated for the HPCI room (Dresden only), (1b) the licensee should justify the discrepancy between the 1-hour temperature given in the submittal and the calculated steady state temperature for the RCIC room (Quad Cities only), (2) the licensee should address SBO equipment that may not have been evaluated for the effects of loss of ventilation, and (3) the licensee should verify whether the control room and AEERs heat-up calculations were performed using the pertinent initial maximum bounding design temperatures for these rooms in lieu of normal room temperatures. These evaluations and verifications and any resulting modifications should be included in the documentation supporting the SBO submittals that are to be maintained by the licensee.

- **Dresden and Quad Cities Safety Evaluation Section 2.3.5**

  The licensee should indicate whether the CIVs that are procedurally closed during power operation are normally locked closed or they will fail closed on loss of ac power or air. In addition, the licensee should ensure that these air or ac operated CIVs remain properly positioned during an SBO event by providing capability for valve position indication, independent of preferred and Class 1E power supplies. This information and verification including clarifications for the CIVs listing discrepancies should be included in the documentation supporting the SBO submittals that are to be maintained by the licensee.

- **Quad Cities Safety Evaluation Section 2.3.6**

  The licensee should provide information to address the required makeup to compensate for RCS shrinkage as a result of the limited cooldown to assure the availability of proper reactor coolant inventory. This information should be included in the documentation supporting the SBO submittals that are to be maintained by the licensee.

CECo is currently evaluating each of these recommendations, and the results of these evaluations will be retained in the SBO files. Any procedure revisions which result from these evaluations will be completed by August 31, 1992, which is within two years from the date of the safety evaluations for Dresden and Quad Cities Stations. Although it is not expected that any equipment modifications will result from these recommendations, CECo will notify your staff of any new modifications by December 11, 1991. Additionally, an appropriate implementation schedule will be provided at that time.

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In Reference (b), CECo indicated that those SBO procedure revisions which were not associated with an equipment modification would be completed by December 20, 1991 for each station. Additionally, CECo indicated that implementation of the emergency diesel generator reliability program would be implemented at each station by December 20, 1991. Although progress has been made on these activities, CECo has determined that completion/implementation will take longer than originally expected. Therefore, CECo proposes the revised schedule:

- The SBO procedure revisions which are not associated with equipment modifications, or the emergency diesel generator reliability program, will be completed by August 31, 1992;

- The emergency diesel generator reliability program, and associated procedure revisions, will be implemented by December 11, 1992 (which is two years from the date of the safety evaluations for each station).

The completion dates presented in this response are consistent with the schedule requirements specified in the SBO rule.

Please contact this office should further information be required.

Respectfully,

Milton H. Richter

Milton H. Richter
Nuclear Licensing Administrator

cc: A. Bert Davis, Regional Administrator - RIII
B.L. Siegel, NRR Project Manager - Dresden
L.N. Olshan, NRR Project Manager - Quad Cities
W.G. Rogers, Senior Resident Inspector - Dresden
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