



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

January 24, 1992

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

Attn: Document Control Desk

Subject: Commonwealth Edison Response to Generic Letter
 91-11 for Dresden Station

Dresden Units 2 and 3, NRC Docket Nos. 50-237 and 50-249

Reference: Generic Letter 91-11, "Resolution of Generic Issue 48,
 LCOs for Class 1E Vital Instrument Buses, and 49, Interlocks
 and LCOs for Class 1E Tie Breakers"

Dear Dr. Murley:

Generic Letter 91-11 was issued as part of the resolution of Generic Issue 128, "Electrical Power Reliability." The Generic Issues (GI-48 and GI-49) addressed by this Letter involve vital AC buses and tie breakers. Specifically, the Generic Letter recommends that nuclear plants ensure that procedures are in place that include time limitations and surveillance requirements for; vital instrument buses (VIBs), inverters to VIBs, and tie breakers that can connect redundant Class 1E buses (AC or DC) at one unit or that can connect Class 1E buses between units at the same site.

Commonwealth Edison (CECo) has reviewed Generic Letter 91-11 and has determined that certain Instrument Bus power supplies and safety-related bus-tie breakers exist at Dresden that are within the scope of the Generic Letter. In order to comply with the Generic Letter, time clocks and surveillance requirements are being developed and appropriate Administrative Controls implemented to ensure that the plant is operated consistent with the Licensing Basis with respect to the subject equipment.

The following equipment will require the above mentioned controls to be consistent with the recommendations of the Generic Letter.

Vital Instrument Buses (VIBs) and Power Sources to the VIBs.

Procedures will be developed for the 120/240 VAC Essential Service Bus and the 120/240 VAC Instrument Bus.

Tie Breakers

Procedures will be developed for the following common unit cross-tie situations; 1) Buses 28 to 29 (Unit 2) (38 to 39 on Unit 3) and 2) the MCC 28/29-7, LPCI Swing Bus.

For cross-tieing between units, a procedure will be developed for the 24-1 to 34-1 tie breakers.

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Based on the guidance given by the Generic Letter, a periodic surveillance requirement has been determined to be applicable. A draft Technical Staff Procedure is being developed to meet the surveillance requirement and to ensure that the subject equipment is available and in-position consistent with the Licensing Basis of the plant. This procedure is expected to be formally approved and a General Surveillance Program (GSRV) file created by March 31, 1992, (NTS 237-104-91-01101). The validity of this assessment will be further evaluated upon the completion of Individual Plant Examination (IPE) program (NTS 237-104-91-01102). LCOs for the subject tie breakers will be based upon the Technical Specification requirements for an inoperable bus.

To ensure that adequate Administrative Controls exist for the subject equipment, Dresden Administrative Technical Requirements (DATRs) will be established to identify the LCOs and surveillance requirements. These DATRs are also expected to be approved by March 31, 1992, (NTS 237-104-91-01103)

Commonwealth Edison will confirm, in a follow-up letter, that these controlling procedures are in place. This will be provided by March 31, 1992.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respect these statements are not based on my personal knowledge, but on information furnished by other CECo employees, contractor employees, and consultants. Such information has been reviewed in accordance with Company practice, and I believe it to be reliable.

If there are any questions or comments, please contact me at (708) 515-7292.

Sincerely,

David J. Chrzanowski
Nuclear Licensing Administrator
Generic Issues

- cc: A. Bert Davis, Regional Administrator-RIII
- B. Siegel, Project Manager-NRR/PDIII-2
- R. Elliott, Project Engineer-NRR/PDIII-2
- W. Rogers, Senior Resident Inspector-Dresden

State of Ill, County of Cook
Signed before me on this 27th day
of January, 1992 by DJC
Notary Public [Signature]

