



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

November 4, 1992

Mr. Thomas Murley, Director
 Office of Nuclear Regulatory Regulation
 U. S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Attention: Document Control Desk

Subject: Generic Letter 91-11 "LCOs for Class 1E Vital Instrument Buses," and "Interlocks and LCOs for Class 1E Tie Breakers" dated July 18, 1991

Commonwealth Edison Response to Generic Letter 91-11 for Dresden Station Units 2 and 3, NRC Docket Numbers 50-127 and 249 and TAC Numbers M82406 and M82407

- Reference:**
- 1) Commonwealth Edison letter, D. J. Chrzanowski to the U.S. N.R.C., Dr. T. E. Murley dated January 24, 1992
 - 2) Commonwealth Edison (CECo) Letter, M. A. Jackson to the U.S. N.R.C., Dr. T. E. Murley dated May 12, 1992.

Dr. Murley,

The purpose of this letter is to provide the Commonwealth Edison submittal in response to Generic Letter 91-11 for Dresden Station. Generic Letter (GL) 91-11 recommends that nuclear plants have administrative controls 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.

CECo documented in reference letter 1) that certain instrument bus power supplies and safety related bus tie breakers exist at Dresden Station within the scope of the Generic Letter. In order to comply with the GL, CECO committed to provide time limitations, surveillance requirements, and administrative controls for the subject equipment. Please review the following actions implemented to meet the requirements of GL 91-11:

Vital Instrument Buses (VIBs) and Power Sources to the VIBs Dresden Administrative Technical Requirements have been revised or established to include limiting conditions for operations (LCOs) for the 120/240 VAC Essential Service and Instrument Buses;

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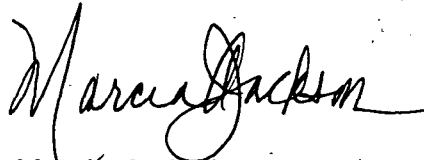
Tie Breakers

Dresden Administrative Technical Requirements have been established to include limiting conditions of operations (LCOs) for Class 1E (AC or DC) breaker positions. Periodic surveillance requirements have also been added for the Class 1E(AC or DC) breaker positions.

Based on the above information, CECO concludes that Dresden station meets the requirements of Generic Letter 91-11.

If there are any questions or comments, please contact me at (708) 515-7287.

Respectfully,



Marcia A. Jackson
Nuclear Licensing Administrator
Generic Issues

cc: A. Bert Davis, Regional Administrator, RIII
R. Barrett, Project Director, NRR
B. Siegel, Project Manager, NRR
R. Elliot, Project Manager, NRR
W. Rogers, Senior Resident Inspector, Dresden

MAA/dhj