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November 24, 1992

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Station Blackout (SBO)
NRC Docket Nos. 50-237/249 and 50-254/265

References: (a) M. Richter memo to T. Murley, dated September 9, 1991.
(b) L. Olshan memo to T. Kovach, dated July 18, 1991.

Dr. Murley:

On December 11, 1990, Commonwealth Edison (CECo) received the NRC Staff Safety Evaluations for the Station Blackout (SBO) rule, 10 CFR 50.63, for Dresden and Quad Cities Stations. These safety evaluations presented several recommendations that CECo was requested to address. In Reference (a), CECo presented an updated response to the recommendations presented in the NRC SER. Reference (b) provided the NRC Staff evaluation of CECo's response. The purpose of this letter is to provide an update on the status of issues in the time frame since the Reference (b) letter.

Emergency Diesel Generator (EDG) Reliability Program

In Reference (a), CECo committed to implement an EDG reliability program by December 11, 1992. Although progress has been made on this activity, CECo has determined that completion/implementation will take longer than originally expected. The EDG reliability program and associated procedure revisions will be implemented by September 1, 1993.

The implementation date for the EDG reliability program has been extended due to the issuance of a draft rule revision to 10 CFR 50.63 and a second draft Revision 3 to Regulatory Guide (RG) 1.9 by the NRC Staff in April, 1992. The proposed 10 CFR 50.63 rule revision and draft RG 1.9, Revision 3 contained several issues which were inconsistent from previously released NRC or industry developed EDG reliability program guidance.

CECo has discussed these issues with the NRC Staff through NUMARC. The most significant issues raised were: 1) references to automatic Level III violations for EDG double trigger exceedance conditions; 2) increased EDG testing requirements when a Unit is in a double trigger exceedance condition; 3) inclusion of EDG availability targets within an EDG reliability program document; and 4) addition of a target trigger value for three valid failures

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in the most recent twenty valid demands on an individual EDG basis. Several months were required to fully evaluate these issues and their impact on the development of an EDG reliability program for Dresden and Quad Cities. Therefore, CECo has delayed implementation of the EDG reliability program and associated procedure revisions for Dresden and Quad Cities Stations until September 1, 1993.

Dresden Isolation Condenser Modifications

The referenced modifications for the isolation condenser level indication has been completed for Dresden Unit 3 (D3R12). CECo committed to complete the modifications for the isolation condenser level indication and associated procedure revisions by the end of the Fall 1992 refueling outage for Dresden Unit 2 (D2R13). CECo's February 15, 1991 submittal contained a typographical error that inadvertently specified Unit 3. Due to refuel outage re-scheduling, the originally scheduled commencement date for D2R13 has been changed to January of 1993. Therefore, the associated modifications will be completed by the end of D2R13.

Please contact this office should further information be required.

Sincerely,



Peter L. Piet

Nuclear Licensing Administrator

cc: A. B. Davis, Regional Administrator - RIII
B. L. Siegel, NRR Project Manager - Dresden
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