



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 23, 1993

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 Company
10 CFR Part 21 Interim Report 93-007
Dresden/Quad Cities Station Emergency Operating Procedures
and Guidance Related to the Alignment of Post-LOCA
Decay Heat Removal Systems

Reference: (a) March 19, 1993 letter from T.K. Schuster to T.E. Murley

Dear Dr. Murley:


The purpose of this letter is to revise the information contained in the referenced 10 CFR Part 21 interim report. The interim report addressed the concerns by Commonwealth Edison Company (CECo) regarding the subject procedures and information provided by the Boiling Water Reactor Owners Group (BWROG) in Revision 4 of the BWROG Symptomatic Emergency Procedure Guidelines.

As stated in the Reference (a) letter, ECCS may not be capable of achieving the required water level as specified in Dresden Station's Emergency Operating Procedures. CECo indicated (Reference (a)) that review of this issue would be complete by April 26, 1993. However, due to additional on-going analyses, our evaluation has not been completed. CECo will complete the 10 CFR Part 21 evaluation by June 16, 1993. A Final 10 CFR Part 21 Report will be issued by June 23, 1993.

Provided as an attachment to this letter is CECo's revised interim report in accordance with the requirements of 10 CFR Part 21, Section 21.21(a)(2).

If there are any questions regarding this notification, please direct them to Eric S. Steckhan at (708) 663-7437.

Respectfully,


for Terence K. Schuster
Licensing Operations Manager

Attachment: 10 CFR Part 21 revised Interim Report

cc: A. Bert Davis, Regional Administrator - RIII
J.E. Dyer, Directorate-III-2 Director, NRR

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10 CFR Part 21 Interim Report 93-007 Dresden/Quad Cities Emergency Operating Procedures and Guidance Related to the Alignment of Post-LOCA Decay Heat Removal Systems

Applicability

This notification is submitted in accordance with the requirements of 10 CFR Part 21, Section 21.21(a)(1).

Identification of Facility and Component

Dresden Nuclear Generating Station Units 2 and
Quad Cities Nuclear Generating Station Units 1 and 2
Revision 4 of the BWROG Emergency Response Guidelines

Identification of Component Manufacturer/Supplier

General Electric Company
175 Curtner Avenue
M/C 171
San Jose, CA 95125

Nature of Defect

Depending on break size and location, ECCS systems may not be capable of maintaining or establishing vessel level above top of active fuel following a LOCA. This is due to the potential of water draining out of the break through the jet pumps. The core will be reflooded to at least 2/3 height with a single LPCI or Core Spray pump. This is a design feature of these plants.

If the assumed single active failure is a diesel generator, then without offsite power it is not possible to align a CCSW pump without securing a LPCI pump. This limitation is based on the maximum diesel generator loading. Revision 4 of the BWROG Symptomatic Emergency Procedure Guidelines (NEDO 31331) recommend that the LPCI pumps not be secured until vessel level reaches top of active fuel. The CCSW pump must be started in order to establish long term decay heat removal.

Time of Discovery

Commonwealth Edison Company first determined that the defect in the analysis could potentially adversely affect licensing basis and that the defect could be reportable per 10CFR21 on January 12, 1993.

Number and Location of All Defective Components

The recommendations of Revision 4 of the BWROG Symptomatic Emergency Procedure Guidelines affect the Emergency Operation Procedures at Dresden Units 2 and 3 and Quad Cities Units 1 and 2. Commonwealth Edison has notified General Electric Company to determine whether other BWRs could be affected.

Corrective Actions:

Operations personnel have evaluated the potential defect, and made the appropriate changes to operator training to ensure that if core level cannot be established or maintained at or above the top of active fuel, then appropriate actions will be taken to ensure that CCSW is aligned in a timely fashion in conjunction with other recovery actions intended to flood containment and recover core level.

10 CFR 21 Evaluation

ECCS may not be capable of achieving the required water level as specified in Dresden Station's Emergency Operating Procedures. CECo will complete the 10 CFR Part 21 evaluation by June 16, 1993. A Final 10 CFR Part 21 Report will be issued by June 23, 1993.

Contacts

Questions pertaining to this notification should be addressed to:

Eric S. Steckhan
Engineering and Construction- PRA & Reliability Engineering
Commonwealth Edison Company
1400 Opus Place, Suite 300
Downers Grove, IL 60515
(708) 663-7437