



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 10, 1993

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Dresden Station Response to NRC Bulletin 93-02, "Debris Plugging of
Emergency Core Cooling Suction Strainers"

Dresden Station Units 2 and 3,
(NRC Dockets 50-237 and 50-249)

The purpose of this letter is to provide the Dresden Station response to the subject Bulletin. The details of the Dresden response are provided in the attachment. In summary, Dresden has performed the requested actions of the Bulletin and has performed an administrative review of the use of fibrous materials in the Unit 2 and Unit 3 containments. In addition, a physical walkdown of Unit 2 drywell was performed during the recent, D2R13, refuel outage. During this walkdown, temporary blanket insulation was found to be installed. Since an evaluation for LOCA capability did not exist for this material, it was removed from the drywell and replaced with an acceptable alternate material.

A dry well entry is planned for Unit 3 to inspect for this temporary fibrous insulation. The inspection and any required evaluation or removal will be performed prior to the 120 day time period established in the Bulletin (by September 8, 1993). Commonwealth Edison will notify the NRC of the results of this inspection.

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

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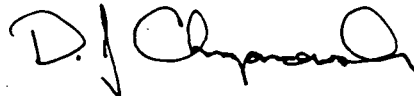


TELL

June 10, 1993

If there are any questions or comments, please contact me at (708) 663-7292.

Sincerely,

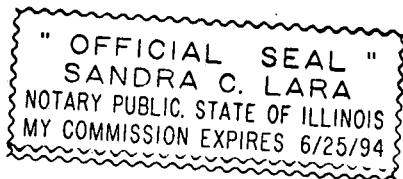


David J. Chrzanowski
Nuclear Regulatory Services

Attachments: Dresden Station Response to Bulletin 93-02.

- cc: Regional Administrator-RIII
J. Hickman, Project Manager-NRR/PDIII-2
Dresden Project Manager-NRR/PDIII-2
M. Leach, Senior Resident Inspector (Dresden)

State of Ill., County of Peoria
Signed before me on this 10th day
of June, 19 93 by [Signature]
Notary Public [Signature]



ATTACHMENT
DRESDEN STATION RESPONSE TO BULLETIN 93-02

REQUESTED ACTIONS

Identify fibrous air filters or other temporary sources of fibrous material, not designed to withstand a LOCA, which are installed or stored in your primary containment. Take any immediate compensatory measures which may be required to assure the functional capability of the ECCS. Take prompt action to remove any such material. Because of the low probability of a LOCA event, the staff considers removal of this material at the next shutdown, or within 120 days, whichever comes first, to be sufficiently prompt. If the facility is currently in a shutdown, you are requested to remove such material prior to restart.

RESPONSE

Dresden's drywell cooling system for Unit 2 and for Unit 3 does not utilize fibrous filter material; the intakes utilize a wire mesh screen only. There is no other equipment in either drywell which requires the use of fibrous filter media.

With Dresden 2 in refuel at the time the bulletin was issued (D2R13), walkdowns of the drywell were conducted and it was identified that Tempmat blanket type insulation, which is not approved for use in the drywell, had been installed during that outage and a previous refuel outage. To the best of our knowledge all locations where the Tempmat was installed were identified. This insulation was removed and replaced with qualified NUKON insulation under Work Request D18804 prior to restart on May 25. An investigation has been initiated (Cause Determination Evaluation (CDE) 2-201-93-603) to identify the cause of the unapproved insulation being installed (NTS Commitment 237-201-93-60300).

The NUKON insulation which was installed in place of the Tempmat is approved by Dresden Specification K-4080, which identifies LOCA qualification as a requirement to be met if blanket type insulation is to be installed in the drywell. This requirement was incorporated into the specification as a result of NRC Information Notice 88-28, Potential for Loss of Post-LOCA Recirculation Capability due to Insulation Debris Blockage. Section 1610.5 of the specification, "Requirements for Blanket Insulation Inside Containment," stipulates that the insulation shall meet the requirements of Regulatory Guide 1.82, providing for the operation of the emergency spray or recirculation systems in the event of a LOCA.

ATTACHMENT
DRESDEN STATION RESPONSE TO BULLETIN 93-02

A drywell entry is planned for Unit 3 to inspect for any temporary sources of fibrous material. Based on the results of the inspection, an evaluation will be performed for qualification and a decision will be made whether Unit shutdown and removal of the material will be performed. This decision will be made within the necessary time frame to support shutting down by September 8, 1993 (120 days from the date of the bulletin). This action will be tracked as NTS commitment 249-101-93-00201.

If loose fibrous materials such as rags are brought into the drywell during the performance of maintenance activities, Dresden does not face the same risk of dropping these materials directly into the suppression pool as Perry Station. Perry Station has an open suppression pool covered by grating which is easily accessible from the drywell area, while Dresden has a toroidal suppression pool, where the pipeways connecting the pool to the drywell are connected at the sides of the drywell instead of directly underneath. Additionally, there are solid protective shields (missile shields) positioned over the pipeway openings. No loose fibrous material of any type is left in the drywell for storage; any loose fibrous material and other debris are removed prior to drywell closeout.

Administrative controls in place to provide assurance that loose debris is removed are Dresden Operating Surveillance (DOS) DOS 1600-10, Drywell Closeout Inspection Plan and Dresden Technical Surveillance (DTS) 1600-11, Torus, Drywell and Drywell Head Coating Inspection. DOS 1600-10, which is performed at the time of drywell closure at the end of a refuel outage, includes a check for foreign material; DTS 1600-11 is performed every refuel outage to assure that any loose or delaminated surface coating is identified and removed to prevent blockage of the ECCS strainers. DTS 5750-01, Unit 2(3) Drywell Cooling System Line Up Checklist, verifies that there is no foreign material in the drywell cooler intakes. Dresden maintenance procedure DMP 0040-20, Drywell Insulation Inspection, is performed to inspect and determine the serviceability of the Drywell insulation.