

OCT 22 1993

DCD/DCB

Docket Nos. 50-237; 50-249

Commonwealth Edison Company
ATTN: Mr. M. J. Wallace
Vice President and
Chief Nuclear Officer
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: RESPONSE TO DRESDEN INSPECTION REPORT 50-237/93012;50-249/93012

- References: (a) Brent Clayton letter to L. O. DelGeorge, dated May 26, 1993, transmitting Inspection Report 50-237/93012;50-249/93012
- (b) D. Farrar letter to Document Control Desk, dated June 24, 1993, transmitting requested response to Inspector Followup Item 50-237/93012-01 transmitted with Inspection Report 50-237/93012;50-249/93012
- (c) D. Farrar letter to Document Control Desk, dated September 23, 1993, providing clarification to Inspector Followup Item 50-237/93012-01.

Dear Mr. Wallace:

This will acknowledge receipt of your letter dated September 23, 1993, in response to our letter dated May 23, 1993, transmitting an Inspector Followup Item associated with Inspection Report 50-237/93012; 50-249/93012 (DRP). Some of the issues raised in your letter, regarding the operability of the control room emergency ventilation system, necessitate further discussion and clarification.

First, your letter suggests the control room emergency ventilation system was functional because the radioactive effluent filtration capability of the control room emergency ventilation system remained functional and that the system could not be considered inoperable since a Technical Specification governing operability of the control room emergency ventilation system does not exist for Dresden Station.

Dresden Safety Analysis Report (SAR), Section 10.11.4, "Control Room Ventilation System," states that the control room heating, ventilation, and air conditioning (HVAC) system is designed to maintain the control room within the design temperature range of 70°F (minimum) to 80°F (maximum) as defined in SAR, section 10.11.2. By removing both containment cooling service water supply trains to the control room emergency ventilation refrigeration condensing unit from service,

9310280228 931022
PDR ADOCK 05000237
Q PDR

IEO/
1/0

OCT 22 1993

Commonwealth Edison Company

2

the ability of the control room HVAC system to meet one of its specified functions, i.e. cooling, should have been questioned. Without this question being answered, the system should have been considered inoperable until a satisfactory engineering analysis was performed to justify system operability.

Second, we are concerned with your implied limitation that operability determinations need only be made for those systems having Technical Specifications. Operability of systems identified within the design bases of the plant, i.e. the Safety Analysis Report, but not addressed by the Technical Specification licensing bases must be evaluated for their impact on safety in accordance with the requirements of 10 C.F.R. 50.59.

Although we strongly encourage activities designed to improve the reliability of plant systems, these activities must be reviewed and accomplished in a manner which will not challenge the operation of the plant by placing it outside its design parameters. This issue will be a topic for discussion at the next management meeting.

Original signed by E. G. Greenman

Edward G. Greenman, Director
Division of Reactor Projects

cc:

- L. DelGeorge, Vice President, Nuclear Oversight & Regulatory Services
- M. Lyster, Site Vice President,
- G. Spedl, Station Manager
- J. Shields, Regulatory Assurance Supervisor
- D. Farrar, Nuclear Regulatory Services Manager
- OC/LFDCB
- Resident Inspectors, Dresden
LaSalle, Quad Cities, Clinton
- R. Hubbard
- J. McCaffrey, Chief, Public Utilities Division
- R. Newmann, Office of Public Counsel, State of Illinois Center
- Licensing Project Manager, NRR
- State Liaison Officer
- Chairman, Illinois Commerce Commission
- J. B. Martin, RIII
- H. J. Miller, RIII
- T. O. Martin, RIII
- J. E. Dyer, NRR
- E. J. Leeds, NRR
- M. L. Jordan, RIII
- C. D. Pederson, RIII
- S. Stasek, SRI, Davis Besse

bcc: PUBLIC

RIII
P2H
Hiland
10/20

RIII
P2H
Clayton
10/20

RIII
Cah
Hausman
10/20/93

RIII
Tom
Martin
10/21

RIII
WJ
Greenman