

APR 15 1994

"Public"

Docket No. 50-237  
License No. DPR-19  
NOED No. 94-3-008

Commonwealth Edison Company  
ATTN: Mr. M. Lyster  
Site Vice President  
Dresden Station  
6500 North Dresden Road  
Morris, IL 60450

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR COMMONWEALTH EDISON COMPANY  
REGARDING DRESDEN STATION UNIT 2

Dear Mr. Lyster:

By letter dated April 14, 1994, you requested the U. S. Nuclear Regulatory Commission (NRC) to exercise its discretion not to enforce compliance with the action requirement for Technical Specification Table 3.2.2. Technical Specification Table 3.2.2 requires that the trip level settings of the degraded voltage relays on the 4 kV emergency buses shall be greater than or equal to 3708 volts (equals 3784 volts less 2 percent tolerance) after less than or equal to 5 minutes (plus 5 percent tolerance) with a 7 second (plus or minus 20 percent) inherent time delay. You declared the degraded voltage relays for the 4 kV emergency buses 24-1 and 23-1 inoperable at 3:00 p.m. on April 13, 1994, after determining that these relays will not trip prior to the actual bus voltage reaching the critical bus voltage.

You informed the NRC on April 13, 1994, at about 3:30 p.m. that Dresden Station was required to commence a power reduction to cold shutdown because two degraded voltage relays for each 4 kV emergency bus on Unit 2 were not operable in accordance with Technical Specification Table 3.2.2. You requested exercise of enforcement discretion for a period of 7 days in lieu of the required reactor shutdown. The specified period was to allow time to evaluate and implement either the calibration or replacement option for these relays. Details of the situation were discussed among staff of this office, the Office of Nuclear Reactor Regulation, and members of your staff in a telephone conference call following your notification. You provided justification for continued operation based on:

1. Unit 2 degraded voltage relays will be available and functional until they are removed for replacement. Each relay outage was estimated to be about 2 hours.
2. Replacement of the relays will be conducted such that at least one degraded voltage relay will be in-service and monitoring voltage. This will change the logic of the degraded voltage trip from two-out-of-two taken once to one-out-of-one.

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3. The CECO electrical grid status is currently green with a daily potential to change to red at peak periods of electrical consumption.
4. The first level undervoltage relays are operable and will not be affected by the relay replacement.
5. All emergency core cooling systems are operable.

On the basis of our evaluation of your justification, including compensatory measures discussed with your staff and subsequently documented in your letter, the NRC staff has concluded that this exercise of enforcement discretion is warranted from the perspective of public health and safety.

Based on the above, this documents our verbal notification on April 13, 1994 at 4:30 p.m. (CDT), of our intention to exercise discretion not to enforce compliance to the action requirement of Technical Specification Table 3.2.2 for the period from April 13, 1994, at 3:00 p.m. (CDT), when the action requirement became effective, until April 20, 1994, at 6:00 p.m. (CDT). However, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,

Edward G. Greenman, Director  
Division of Reactor Projects

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