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Dresden Nuclear Power Station
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February 22, 1994

MDL Ltr. 94-0004

Mr. John B. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Subject: Dresden Nuclear Power Station Unit 3
Request for Regional Enforcement Discretion Regarding Facility Operating License DPR-25, Appendix A,
Technical Specification 4.7.B.2.b(3)
NRC Docket No. 50-249

Dear Mr. Martin:

This letter documents Commonwealth Edison's (CECo) request to the NRC Staff for Enforcement Discretion to extend, for one time only, Technical Specification Surveillance Requirement (SR) 4.7.B.2.b(3) for Dresden Unit 3, until the surveillance can be safety performed during the upcoming scheduled Refuel Outage.

Technical Specification SR 4.7.B.2.b(3) requires an automatic initiation of each standby gas treatment system (SBGTS) subsystem for Dresden Unit 3 before 0817 hours on February 26, 1994. This surveillance is required every 18 months and was last performed for Unit 3 at 0817 hours on April 10, 1992. The February 26, 1994 due date is based upon the 1.25 extension to surveillance intervals allowed by Technical Specification 1.0.CC.

CECo requests that Unit 3 be allowed to continue to operate until the start of the Unit 3 Refuel Outage (D3R13) scheduled to begin on March 12, 1994 at approximately 1200 hours. CECo has concluded that deferring compliance with SR 4.7.B.2.b(3) until more appropriate plant operating conditions are achieved results in a greater preservation of plant safety and avoids unnecessary potential challenges to plant safety systems associated with performing the surveillance at operating conditions.

The basis for our request is provided in Attachment 1 and includes:

- The Technical Specification that will be violated;
- The circumstances surrounding the condition;
- The safety basis for the request that enforcement discretion be exercised, including an evaluation of the safety significance and potential consequences of the proposed course of action;

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- Any proposed compensatory measure(s);
- The justification for the duration of the request;
- The basis for the conclusion that the request will not have a potential adverse impact on the public health and safety and that a significant safety hazard is not involved;
- The basis for the conclusion that the request will not involve adverse consequences to the environment.

Failure to perform Surveillance Requirement 4.7.B.2.b(3) within the specified time interval requires within 36 hours (2017 hours on February 27, 1994) that Unit 3 to be placed in a condition in which the SBGTS is not required to comply with LCO action statement 3.7.B.1.b.

Dresden Unit 2 is unaffected by this request.

This request for Enforcement Discretion has been reviewed and approved by the Dresden On-Site Review Committee, in accordance with Dresden Station procedures.

CECo requests NRC Staff review and approval of our request for Enforcement Discretion prior to February 25, 1994. Please direct any questions or comments to JoAnn Shields, Dresden Regulatory Assurance Supervisor, (815) 942-2920, extension 2714.

Very truly yours,

Michael D. Lyster
Dresden - Site Vice President

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Attachment

cc: M. N. Leach, Senior Resident Inspector - Dresden
B. Clayton, Branch Chief - RIII
J. F. Stang, Project Manager - NRR
NRC Document Control Desk
File: NRC
File: Numerical

1. TECHNICAL SPECIFICATION OR LICENSING CONDITION THAT WILL BE VIOLATED

Technical Specification Surveillance Requirement 4.7.B.2.b(3) requires an automatic initiation of each standby gas treatment system subsystem from Unit 3 before 0817 hours on February 26, 1994. This surveillance is required, at a minimum, every 18 months and was last performed for Unit 3 at 0817 hours on April 10, 1992. The 02/26/94 date is calculated based on the 1.25 extension to surveillance intervals allowed by Technical Specification 1.0.CC. The plant condition required to perform this surveillance requirement is Cold Shutdown or Refuel in order to prevent plant process perturbations associated with the expected Group II Primary Containment Isolation Signals generated during the performance of the surveillance procedure.

Failure to perform Surveillance Requirement 4.7.B.2.b(3) within the specified time interval would require Unit 3 to be placed in a condition in which the SBGTS would not be required within 36 hours to comply with LCO action statement 3.7.B.1.b

Therefore, CECo requests Enforcement Discretion from Technical Specification Surveillance Requirement 4.7.B.2.b(3) to extend, for one time only, the surveillance interval for the SBGTS auto-initiation test until the surveillance can be safely performed during the upcoming scheduled refuel outage on Unit 3.

2. CIRCUMSTANCES SURROUNDING THE SITUATION

During a review of surveillances that were coming due, CECo identified an apparent discrepancy between the required plant conditions for the performance of DIS 7500-01 "SBGT AUTO-ACTUATION" and the General Surveillance Program (GSRV) record for the same surveillance procedure. DIS 7500-01 requires the unit under test to be in a plant condition in which the Primary Containment is not required. This condition is cold shutdown or refuel. Unit 3 will not reach a cold shutdown condition until the refueling outage (D3R13) currently scheduled for March 12, 1994 at approximately 1200 hours. The GSRV record was found to list the plant condition required for the performance of DIS 7500-01 as "any". The GSRV record has since been corrected to show the plant condition as "cold shutdown" or "refuel."

Compliance with the SR 4.7.B.2.b(3) requires the performance of DIS 7500-01. CECo also evaluated creating a special procedure to test the auto-initiation circuitry from any Group II isolation signal. The vulnerabilities of performing DIS-7500-01 and a special test configuration with Unit 3 on-line are discussed in more detail in Sections 2.A and 2.B, respectively.

A. DIS 7500-01

Performance of DIS 7500-01 to demonstrate the auto-initiation of SBGTS causes the closure of many valves, the illumination of many main control room panel annunciators and prevents (p) or causes (c) the following;

1) Nitrogen Makeup to the Containment (p)
2) Routine Venting of the Containment (p)
3) Pumping the Drywell Equipment Drain Sumps (p)
4) Pumping the Drywell Floor Drain Sumps (p)
5) Control of Drywell to Torus Differential Pressure (p)
6) Isolation of primary nitrogen supply to the primary containment nitrogen operated valves (Main Steam Isolation Valves) (c).
7) Trip of the Reactor Building Floor Drain Sump Pumps. (c)
8) Continuous sampling of the containment atmosphere for oxygen concentration (p)

Item 6 above has the potential to allow the nitrogen operated valves inboard to the primary containment to be held open solely on the back up nitrogen supply. The Main Steam Isolation Valves are among those affected. In addition to anticipated valve movement and sump pump trips, the unit has a potential to enter several limiting conditions for operations (LCOs) while the isolation signal is present.

B. Special Procedure

CECo evaluated the feasibility of performing a part of the DIS 7500-01 as a special procedure. The results of this review showed that SR 4.7.B.2.b(3) can be met with the closure of valves of minimal consequence; however, creation of such a procedure will require the following activities: 1) Placement of at least 2 temporary system alterations in the rear of a main control room panel. Due to location of these alterations, attempting this activity would risk interference with relays and wiring for containment isolation (potential for unplanned ESF actuation). 2) Verification of the equipment that has the potential to change state or position as a result of the temporary alteration. This requires physical interference with the same relays and wires associated with placement of the actual temporary alterations.

Based on the above information, CECo concluded that deferring compliance with SR 4.7.B.2.b(3) for 15 days results in a greater preservation of plant safety and avoids unnecessary potential challenges to plant safety systems associated with performing the surveillance in its entirety or in an abbreviated version on-line.

3. EVALUATION OF SAFETY SIGNIFICANCE AND CONSEQUENCES

The Standby Gas Treatment System is designed to filter and exhaust the reactor building atmosphere to the chimney during secondary containment isolation conditions, with a minimum release of radioactive materials from the reactor building to the environment. One standby gas treatment train is designed to automatically initiate upon containment isolation and to maintain the reactor building pressure to approximately a negative 1/4 inch water gauge pressure. The SBGTS auto-initiates on the following Secondary Containment Isolation signals: 1) Fuel Pool Radiation-High 2) Reactor Building Vent Radiation-High. The functional test of these monitors is performed every three months. The auto-initiation of SBGT from the Secondary Containment Isolation signals is demonstrated during these quarterly surveillances. Therefore, the part of DIS 7500-01 that initiates SBGTS from Secondary Containment isolations has been demonstrated operable repeatedly throughout the cycle. Therefore, refuel floor and secondary containment activities during the period of time that discretionary enforcement is requested and enveloped by these SBGTS operability demonstrations. Thus, there is no reduction in safety margin during refuel floor and activities involving secondary containment.

The primary containment isolation signals that also provide a SBGTS auto-initiation are 1) Primary Containment Pressure-High (greater than 2 psig pressure in the drywell); 2) Primary Containment Radiation-High (greater than 100 R/hr within the drywell); and 3) Reactor Water Level-Low (less than 8 inches (indicated) reactor water level). The auto-initiation of SBGT from these surveillances is also tested during the performance of DIS 7500-01.

The primary containment isolation function on Reactor Water Level-Low is verified operable once per month when the reactor scram function on Reactor Water Level-Low instrumentation is functionally tested per DIS 500-02 "Reactor Water Level Scram and Low Low Water Isolation Analog Trip System Calibration.". The primary containment isolation function on Primary Containment Pressure-High is functionally tested once per month during the functional test of the reactor scram on Primary Containment Pressure-High per DIS 1600-02 " Drywell High Pressure Scram Switches Calibration". Therefore the logic system, up to the relays that initiate the SBGTS from a PCIS signal, are routinely exercised to verify operability although actuation of the SBGT does not occur. Functional test of the Primary Containment Radiation-High isolation is not required by the Technical Specifications, however, calibration of the monitors is performed every refuel outage as required by Post Accident Monitoring Table 4.2.6. The previous calibration and corresponding functional test demonstrated that monitors function as required. Standby Gas Treatment is verified operable once per month as required by SR 4.7.B.1.

The extension of SR 4.7.B.2.b(3) is an inconsequential increase in the time frame that does not significantly reduce the safety margin for Dresden Unit 3. Because SBGTS

has been routinely demonstrated operable during the recent operating cycle, CECo has confidence that the performance of SR 4.7.B.2.b(3) will confirm the operability of the auto-initiation logic. In addition, the system can be manually initiated by the control room operators. In conclusion, the extension of SR 4.7.B.2.b(3) for approximately 15 days does not significantly reduce the margin of safety and does not significantly increase the consequences of currently analyzed accidents for Dresden Unit 3.

4. COMPENSATORY ACTIONS

The following compensatory actions have been completed or will be initiated and maintained during the period of enforcement discretion:

1) The most recent surveillances for the Primary Containment sensor calibrations and functional test have been reviewed and found to be acceptable for operation during the enforcement discretion period.

2) To reduce the probability of a Loss of Offsite Power event, the Joliet load dispatcher will be notified of the discretionary enforcement circumstances at Dresden so that switchyard operations that may effect Dresden will be minimized to necessary operations only.

3) Appropriate site personnel will be notified that evolutions that may effect SBGT operability must get prior approval from the Operating Engineer.

4) Operations personnel will be informed of the enforcement discretion requirement and the associated compensatory actions.

5) Site maintenance and surveillances schedules will be reviewed by Work Control personnel to insure that activities, that may require SBGT auto-initiation, will be limited.

5. JUSTIFICATION FOR THE DURATION OF THE REQUEST

CECo believes that the requested duration of 15 days for enforcement discretion is justified for the following reasons.

1) All Unit 3 sensors that initiate the SBGT system have been demonstrated to operate as required per routine surveillance.

2) The SBGT system is capable of being manually started and auto-started from Secondary Containment isolation signals.

3) The ability of the SBGT system to auto-initiate from Secondary Containment

isolation signals has been demonstrated throughout the cycle.

4) The previous performances of DIS 7500-01 validated that the system performed successfully. Thus, the most probable result of this particular SR is the verification of conformance with SR 4.7.B.2.b(3).

5) The extension of the surveillance interval for 15 days beyond the 22½ month allowable surveillance interval will have a negligible effect upon operation since the sensors have been tested within their surveillance intervals, most of the logic has been tested, and the start logic for standby gas treatment has also been tested throughout the cycle.

6) The SBGT auto-initiation from the Unit 3 Group II Isolation functioned during the January 16, 1993 loss of instrument air event.

7) The dates of the three previous performances of DIS 7500-01 are 04/10/92, 09/29/91, and 12/16/89. Performance of DIS 7500-01 anytime prior to the scheduled end of the Unit 3 refueling outage would result in 3 consecutive completed surveillances within three 550 day (18 month) surveillance intervals.

6. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed request for Enforcement Discretion and determined that it does not represent significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Dresden Station Unit 3 in accordance with the proposed request will not:

1) **Involve a significant increase in the probability or consequences of an accident previously evaluated because:**

The accidents that require the availability of the SBGTS auto-initiation are the LOCA and the refueling accidents. Delaying the requirement to perform the auto initiation surveillance until April 1994 will not alter any LOCA or refueling accident precursors. The compensatory actions taken further reduce the probability of the occurrence of a LOOP. In addition, the most probable result of this particular SR is the verification of conformance with the SR. Therefore, the probability of occurrence of a LOCA or refueling accident has not been increased.

2) **Create the possibility of a new or different kind of accident from any accident previously evaluated because:**

New plant configurations or modes of operation for the SBGT or PCIS system will not be required to implement the compensatory actions. The extension of the 22½ month allowed surveillance interval for 15 days will have a negligible effect on the probability of a LOCA without SBGT. Therefore, the probability of a new or different accident has not been increased.

3) **Involve a significant reduction on the margin of safety because:**

The margin of safety has not been significantly reduced by delay of the auto-initiation surveillance. Observation of operability from an actual event within the last surveillance interval in conjunction with the aforementioned compensatory actions offset any reduction in the margin to safety.

Guidance has been provided in "Final Procedure and Standards on No Significant Hazards Consideration," Final Rule, 51 FR 7744, for the application of standards to license to change requests for determination of the existence of significant hazards consideration. This document provides examples of amendments which are and are not likely considered to involve a significant hazards consideration. This request for enforcement discretion most closely fits the example of a change which may either result in some increase to the probability of the consequences of previously analyzed accident or may reduce in some way the margin of safety, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the applicable Standard Review Plan.

This request for enforcement discretion does not involve a significant relaxation of the criteria used to established safety limits, a significant relaxation of the bases for the limiting safety system setting or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provide in Federal Register and the criteria established in the 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

7. ENVIRONMENTAL ASSESSMENT

Dresden Station has evaluated the proposed request for enforcement discretion against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that proposed request for discretionary enforcement meets the criteria for categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the circumstances surrounding the request in conjunction with the compensatory actions do no pose a significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of any effluent that may be released off-site. Additionally, this request does not involve a significant increase in the individual or cumulative occupational radiation exposure.

8. APPROVAL BY ON-SITE REVIEW

The request has been approved by the Dresden On-site Review and Investigative Function in accordance with station procedures.