



Commonwealth Edison
Dresden Nuclear Power Station
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Telephone 815/942-2920

SITEVP: 94-0014

April 14, 1994

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 2
Request for Regional Enforcement Discretion Regarding Facility Operating
License DPR-19, Appendix A, Technical Specification 3.2.B,
Note 1 to Table 3.2.2
NRC Docket No. 50-237

Reference: Teleconference between Commonwealth Edison and NRC Staff, dated
April 13, 1994.

Dear Mr. Martin:

This letter confirms the conclusions reached during the referenced teleconference between Commonwealth Edison (CECo) and the NRC Staff on April 13, 1994 during which CECo requested Enforcement Discretion. CECo's request for Enforcement Discretion delays entry into Technical Specification Note 1 to Table 3.2.2 for Dresden Unit 2 until 1800 hours on April, 20, 1994 to allow the safe calibration of the Second Level Undervoltage relays for 4 Kv Emergency Buses 24-1 and 23-1. Dresden Unit 3 is unaffected by the Enforcement Discretion due to its refueling outage condition. Commonwealth Edison sincerely appreciates the timely efforts of the NRC staff (both at Region III and NRR) in the review of the proposed Request for Enforcement Discretion.

Technical Specification Table 3.2.2, "Instrumentation that Initiates or Controls the Core and Containment Cooling Systems" requires that two (2) degraded voltage relays be operable per emergency bus. Note 1 of Table 3.2.2 requires an immediate shutdown to cold conditions if both relays are not operable or placed in the tripped condition.

In lieu of following the Actions required by Technical Specification 3.2.B, Table 3.2.2, Note 1, CECo requested that Unit 2 be allowed to continue to operate until 1800 hours on April 20, 1994. At which time, Dresden Unit 2 will enter Note 1 to Table 3.2.2 and proceed to cold shutdown conditions if the Second Level Undervoltage relays are not declared operable. CECo has concluded that deferring compliance with Note 1 to Table 3.2.2 for approximately 7 days results in a greater preservation of plant safety and avoids unnecessary potential challenges to plant safety systems. NRC Region III verbal approval of the Request for Enforcement Discretion was received at 1630 (CDT) on April 13, 1994.

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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;
- 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.

For the duration of the period under which the Enforcement Discretion is requested, Dresden Unit 3 will be in a refueling condition with all fuel removed from the reactor vessel. The Unit 3 Second Level Undervoltage relays are being replaced during the current refueling outage.

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

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

Attachment

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