Commonwealth Edison 1400 Opus Place Downers Grove, IL 60515

November 22, 1995

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U. S. Nuclear Regulatory Commission Washington, D.C 20555

Attn: Document Control Desk

Subject:

Dresden Station Units 2 and 3 Notification of a Change to Schedule for Commitments Related to 10 CFR 50.63, Station Blackout (SBO) Rule NRC Docket Nos. 50-237 and 50-249

References:

(1) M. H. Richter to T. Murley letter dated February 15, 1991

(2) B.L. Siegel to T.J. Kovach letter dated December 11, 1990

(3) L.N. Olshan to T.J. Kovach letter dated July 18, 1991

(4) J. Schrage to USNRC dated September 1, 1995

This letter transmits Commonwealth Edison Company's (ComEd's) notification to the NRC Staff of unavoidable delays in the completion of the Alternate AC - Diesel Generator (AAC-DG) modifications. These mods are necessary for compliance to the requirements of 10 CFR 50.63, the "Station Blackout Rule," (SBO) for Dresden Station. This letter describes the current status of both units, the basis for the delays and ,for completeness, a review of the status of all other SBO commitments.

In order to meet the requirements of 10 CFR 50.63, ComEd committed to install two AAC-DGs at Dresden Station by December 31, 1995 (Reference 1). The NRC Staff reviewed and approved these commitments in the Reference (2) and (3) Safety Evaluations. Completion of these commitments is tied to the return to service for both Dresden Unit 2 and Unit 3 after refueling outages which are needed to safely modify the facility.

Dresden Unit 2

Dresden Unit 2 is currently in its fourteenth refueling outage (D2R14). All physical work and construction tests for SBO have been completed; only limited operability testing remains. However, this testing can only be performed during a specific plant configuration planned for late in the refueling outage. Due to the D2R14 refueling outage replanning efforts, return to service of Unit 2 has been extended into 1996. As such, the remaining AAC-DG testing cannot be completed by December 31, 1995. Prior to Unit 2's return to service from D2R14, all SBO commitments will be completed.

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Upon the completion of the current Unit 2 outage, Dresden Station will be equipped with an additional on-site AAC source, as well as increased operational flexibility provided by the cross-tie of 4 kV safety buses between units. These enhancements will increase safety margins. The large capacity of the AAC DG (4785 kw) in conjunction with the 4kV safety bus cross-ties is sufficient to supply the hot shutdown loads for concurrent LOOP events on Unit 2 and Unit 3.

Dresden Unit 3

Unit 3 is currently in Operating Cycle 14. ComEd is proposing to move the start of the fourteenth refueling outage (D3R14) to September 1996. As such, Unit 3 AAC-DG commitments cannot be completed by December 31, 1995. The remaining work on Unit 3 includes the installation of electrical tie-ins and operability testing of the Dresden Unit 3 AAC-DG systems planned for completion during the D3R14 refueling outage. The remaining physical work requires consecutive and extended outages of both 4 kV safety buses (33-1 and 34-1) that can only be performed during a refueling outage.

The original start of D3R14 was planned for in 1995, however, Unit 3's previous refueling outage was extended (March 1994 - November 1994) to complete a thorough inspection of the reactor vessel core shroud. Furthermore, a problematic startup attempt in August 1994 prompted management to keep Unit 3 in cold shutdown pending an upgrade to operations standards and procedures, improvements to plant material condition and elimination of barriers to continued operation (i.e operator work arounds). Unit 3 returned to service in November 1994.

Unit 3 experience 3 additional reactor scrams which resulted in forced outages of lengths that vary from 2 weeks to 5 months. The 5 month forced outage was necessary to replace failed turbine blades on the Main Turbine. Unit 3 was returned to service from the most recent forced outage on November 7, 1995. Therefore, several forced outages have necessitated reschedule of D3R14 to September 1996.

Status of Other SBO Commitments

In addition to the AAC-DG modifications, ComEd committed to implement other analyses and procedure revisions, all of which were intended to mitigate the consequences of a station blackout event. The status of these commitments was reviewed by the NRC staff during an interim site inspection at Dresden on March 31, 1993 and docketed in Inspection Report 50237/93013.

Procedures for the following events have been updated in accordance with the original commitment: Partial or Complete Loss of AC Power, Ventilation System Failure, Tornado Warnings/Severe Winds, Restoration of AC Power, and Station Battery Performance Tests.

An Emergency Diesel Generator Reliability Program has been established and implemented at Dresden Station since 1993, thereby conforming to the five elements of a diesel generator reliability program as defined by Regulatory Guide 1.155. (This program applies to both AAC DGs and Class 1E DGs)

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The following modifications have been installed:

• Isolation Condenser Level Transmitter Power Supply

This modification moves the power source for the Isolation Condenser level transmitter from the Instrument Bus to Essential Service Bus so that level indications can be read from the control room. The Unit 2 modification was completed in January, 1992 and the Unit 3 modification completed in March, 1993.

• Division I 4kv Cross-Tie

This modification improves off-site power redundancy by installing cross-ties between Buses 23-1 and 33-1. This modification was completed in July, 1994.

ComEd has evaluated the deterministic and probabilistic impact of the delay in completion of the AAC-DG commitments upon the safety and health of the public, as well as the overall risk to nuclear safety. The maximum benefit of adding the AAC-DGs would be a 3.0 E-7 / yr reduction in core damage frequency (CDF). This evaluation has indicated that the proposed exemption does not present an undue risk to the public health and safety.

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with Company practice, and I believe it to be reliable.

If there are any comments or questions pertaining to this letter, please direct them to this office.

Respectfully,

Bable

Bob Rybak Nuclear Licensing Administrator

cc:

H.B. Miller, Regional Administrator - RIII J.F. Stang, NRR Project Manager - Dresden C. L. Vandierniet, Senior Resident Inspector - Dresden Office of Nuclear Facility Safety - IDNS

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