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March 26, 1996

JSPLTR: 96-0041

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 2 Replacement of Safety Related Bus
Overcurrent Trip Devices by Implementation of the RMS-9 Upgrade

Reference: Peter L. Piet letter to Dave Butler dated March 18, 1992 regarding
question #14, raised during March 5, 1992 meeting.

The purpose of this letter is to provide an update of the actions taken regarding the RMS-9 Upgrade. During a meeting held March 5, 1992 between representatives of ComEd and the NRC, a question was raised as to the schedule for replacing the existing EC-2A trip devices on safety related 480 VAC SWGR breakers with new RMS-9 devices. The question (question #14) was stated as follows:

What are the schedule dates to complete the replacement of the safety related bus overcurrent trip devices (RMS-9 trip device replacement); attached NED letter CHRON #180402, priority I, II, III, and IV items?

The ComEd response per the reference #1 letter was as follows:

It is expected that the safety related 480 VAC buses will be coordinated with all safety related MCCs, all loads and bus ties, following completion of the applicable RMS-9 replacements, by the end of D2R14 and D3R14, respectively (maintenance schedules attached).

To date, 33 out of 35 breakers on the Unit 2 safety related 480 VAC SWGRs 28 and 29 have been upgraded with RMS-9 solid state trip units. Of the 35 total, two have not been replaced due to environmental qualification concerns. The feed from SWGR 28 to MCC 28-1 and the main feed to SWGR 28 from Transformer 28 have the potential during certain postulated accident conditions of being subjected to harsh environments. Motor Control Center 28-1 provides power to a Reactor Water Clean Up (RWCU) valve which must function during the RWCU line break accident scenario. Because a RWCU line break may create an environment for which the RMS-9 is not qualified, the feed to MCC 28-1 and the main feed to SWGR 28 have not been converted to new RMS-9 devices.

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The original trip devices are qualified for the postulated environment. Equipment supplied by the breakers with the new RMS-9, required for mitigation of other design basis events, will function satisfactorily, as the trip unit would not be subjected to harsh environmental conditions during those events where the equipment is required for mitigating those accidents.

Two options are being pursued to address this issue. One is to determine a trip device qualified for the postulated environment. Another is to re-evaluate the postulated environment and qualification of the RMS-9 device to determine if it can be used for both the feed to MCC 28-1 and the main feed to SWGR 28. An option will be selected for these two Safety Related breakers and implemented by D2R15.

In the interim, the original EC-2A trip devices will remain installed in both breakers. Although these do not provide selective coordination throughout the entire range of postulated faults, they maintain the original plant design. The lack of selective coordination was not determined to be a design deficiency during the EDSFI but instead was considered a design weakness. Selective coordination is desirable but is a bounded condition by limiting single failure events, such as a bus fault on SWGR 28.

Certain non-safety related services were also included on the schedule for your information. Of the listed non-safety related services, all have been completed except for the following:

Non-Safety Related

Feed from SWGR 27 to MCC 27-5

Main feed from bus 24 to SWGR 26

Cross tie from SWGR 25 to SWGR 26

Cross tie from SWGR 26 to SWGR 25

Feed from SWGR 27 to Turbine Building Weld Receptacles.

The Cross tie from SWGR 26 to SWGR 25 was inadvertently included in the original list. The bus tie between SWGRs 25 and 26 is isolated by one breaker located at SWGR 25. As such, there is no cross tie from SWGR 26 to SWGR 25. The remaining items are rescheduled.

The attached table is an updated version of the tables which were attached to the referenced submittal. The updated version gives the service, the affected SWGR, the safety classification, and the status of completion.

If your staff has any questions concerning this letter, please refer them to Peter Holland, Dresden Station Regulatory Assurance Supervisor, at (815) 942-2920, extension 2714.

Sincerely,

Substituted For
J. Stephen Perry
Vice President
BWR Operations

Attachment

cc: H. J. Miller, Regional Administrator, Region III
J. F. Stang, Project Manager, NRR (Unit 2/3)
C. Vanderniet, Senior Resident Inspector, Dresden
D. Butler, NRC, Region III

ATTACHMENT 1

Number	Affected SWGR	Service	Safety Related	Status
1	25	Main Feed	NSR	Complete
2	25	Cross tie To Bus 26	NSR	Not Complete
3	26	Main Feed	NSR	Not Complete
4	26	Cross tie To Bus 25	N/A	Note 1
5	27	Turbine Bldg Welding Receptacles	NSR	Not Complete
6	27	2B EHC Pump	NSR	Complete
7	27	Feed to MCC 27-1	NSR	Complete
8	27	Feed to MCC 27-5	NSR	Not Complete
9	28	Feed to MCC 28-1	SR	Note 2
10	28	Feed to MCC 28-2	SR	Complete
11	28	2A D/W Cooler	NSR	Complete
12	28	2F D/W Cooler	NSR	Complete
13	28	Feed to MCC 28-3	SR	Complete
14	28	U2 Clean Up Demin Aux Pump	NSR	Complete
15	28	2A Fuel Pool Cooling Pump	NSR	Complete
16	28	Feed to MCC 28-7	SR	Complete
17	28	2B D/W Cooler	NSR	Complete
18	28	2G D/W Cooler	NSR	Complete
19	28	2A Recirc MG Set Vent Fan	NSR	Complete
20	28	Main Feed	SR	Note 2
21	28	Cross tie to bus 29	SR	Complete
22	29	Feed to MCC 29-3	NSR	Complete
23	29	Feed to MCCs 29-5 & 29-6	SR	Complete

Number	Affected SWGR	Service	Safety Related	Status
24	29	2B Recirc MG Set Vent Fan	NSR	Complete
25	29	Feed to MCC 29-7	SR	Complete
26	29	2D D/W Cooler	NSR	Complete
27	29	2B Fuel Pool Cooling Pump	NSR	Complete
28	29	Feed to MCC 29-8	SR	Complete
29	29	Main Feed	SR	Complete
30	29	Cross tie to Bus 28	SR	Complete
31	29	Feed to MCC 29-2	SR	Complete
32	29	Feed to MCC 29-1	SR	Complete
33	29	2C D/W Cooler	NSR	Complete
34	29	2E D/W Cooler	NSR	Complete

Note 1 - It was discovered that this service was inadvertently added to the list of non-safety related services to be completed. As stated above, the tie between SWGRs 25 and 26 is isolated by one breaker at SWGR 25. There is not a tie breaker between the two SWGR at SWGR 26.

Note 2 - As stated above, these services are required to be environmentally qualified and RMS-9 devices are not acceptable for the application.