

Commonwealth Edison Company
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450
Tel 815-942-2920



May 22, 1996

JSPLTR 96-0080

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

SUBJECT: Dresden Nuclear Power Station Unit 3
Request for Emergency License Amendment -
Low Pressure Coolant Injection/Core Spray Corner
Room Structural Steel
Facility Operating License DPR-25
NRC Docket 50-249

Pursuant to 10 C.F.R. 50.91(a)(5), ComEd requests an emergency amendment to facility operating license DPR-25 for Dresden Unit 3. The license amendment would temporarily modify the description of certain corner room steel supports to match their current configuration until they are modified during the next refueling outage, which is scheduled to begin in about four months. The amendment satisfies the criteria for no significant hazards consideration.

A grant of the amendment is warranted because the current situation satisfies the Commission's definition of an emergency: Failure by the Commission to act in a timely way would result in the prevention of resumption of operation. 10 C.F.R. 50.91(a)(5). That emergency would be compounded by the circumstance that operation is important to ensure the availability of this generating resource during the peak load summer months. ComEd could not have avoided this request for the reasons described below.

Operation will continue to be safe until the refueling outage because, as the Commission is aware, Dresden has been operating in the current configuration on the basis of an operability determination which shows that the steel supports are capable of performing their intended safety function. Operation was planned to continue until the next refueling outage because the deviations from the design values have been shown not to result in a significant decrease in the plant's margin of safety. However, on May 15, 1996, a reactor scram occurred on Dresden Unit 3. Had the scram not occurred, Unit 3 would have continued to operate during these critical months as planned and no emergency license amendment would have been necessary. The grant of an emergency license amendment to support continued operation will restore the plant's operating schedule in a manner that has been determined to be safe.

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The emergency situation could not have been avoided for the following reasons: Dresden Unit 3 has been operating on the basis of an operability assessment which showed that operation could continue safely until the start of the next refueling outage. Thus, there was no reason for Dresden management to contemplate a need for regulatory relief at any earlier time. At the same time, Dresden Unit 2 was in an extended outage. Engineering resources, therefore, were devoted to modifying the corner room steel in that unit to conform it to its description in the Updated Final Safety Analysis Report ("UFSAR"). Engineering and procurement resources were scheduled accordingly for Unit 3. Had that unit continued to operate as expected, those resources would have become available as planned and there would have been no need for this emergency amendment request.

However, as a result of the reactor scram, ComEd and the NRC Staff held discussions which led ComEd to conclude that a safety evaluation under 10 C.F.R. 50.59, would be appropriate under the circumstances. The safety evaluation revealed that the current configuration does not reduce the margin of safety significantly with respect to the stress allowable for the steel under the influence of the design basis accident, a Safe Shutdown Earthquake ("SSE"). An unreviewed safety question ("USQ") was determined to exist because stress allowables are not met for the Operating Basis Earthquake ("OBE").

Commission practice, including Generic Letter 91-18, provides the NRC with discretion regarding the circumstances under which a reactor can start up with a temporary nonconforming condition. For ComEd to remove the nonconformance, and make the corner room steel conform to the UFSAR description, will take several weeks because resources had already been scheduled on the assumption that the plant could continue to operate on its operability determination until the next refueling outage, September, 1996. Past experience at Dresden Unit 2 showed it took at least six weeks to complete a similar modification. Dresden Unit 3 may take longer as the configuration presents different engineering challenges to complete the modification; hence an emergency exists as defined by the Commission.

After engineering and procurement are completed (currently scheduled for late July, 1996), Dresden will be able to complete installation during any outage with a duration of greater than six weeks.

No significant hazard consideration will result from the grant of this emergency request for a license amendment. The criteria in 10 C.F.R. 50.92(c) are shown in Attachment A to be met. To date, ComEd has used UFSAR criteria for SSE to recalculate the stresses for one beam in Unit 3 which is believed to be critical to the corner room steel. The results show that the Interaction Coefficient meets the UFSAR criteria for SSE. This preliminary result supports ComEd's engineering judgment that the full calculation (scheduled to complete May 31, 1996) will corroborate the current Unit 3 operability determination. Should that analysis result in a different conclusion, Unit 3 will be promptly shutdown until the design margin is restored. During this interim period, if Unit 3 experiences an OBE of a magnitude defined in the UFSAR, ComEd will shutdown Dresden Unit 3 for inspection.

This proposed emergency amendment request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.
2. Attachment B describes ComEd's evaluation performed in accordance with 10 C.F.R. 50.92(c), which confirms that no significant hazard consideration is involved.
3. Attachment C provides an Environmental Assessment Applicability Review.
4. Attachment D provides the marked up pages of the UFSAR.
5. Attachment E provides the response to the request for additional information.
6. Attachment F is the Safety Evaluation Report on Piping System Operability Criteria dated September 27, 1991

This proposed emergency amendment has been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with ComEd procedures.

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 are obtained from information furnished by other ComEd employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

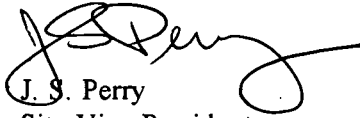
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ComEd is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

Please direct any questions you may have concerning this submittal to Frank Spangenberg, Regulatory Assurance Manager at (815) 942-2920, Extension 3800.

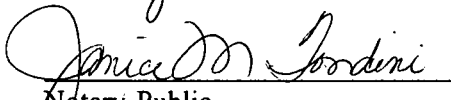
Very truly yours,


J. S. Perry
Site Vice President
Dresden Station

Subscribed and Sworn to before me

on this 22nd day of

May, 1996.


Notary Public



Attachments:

- A. Description and Safety Analysis of Proposed License Amendment
- B. No Significant Hazards Considerations
- C. Environmental Assessment Applicability Review
- D. Marked Up Pages Of UFSAR
- E. Response to Request for Additional Information
- F. SER related to Piping System Operability Criteria dated September 27, 1991

cc: H. J. Miller, Regional Administrator - RIII
C. L. Vanderniet, Senior Resident Inspector - Dresden
J. F. Stang, Project Manager, NRR
Office of Nuclear Facility Safety - INS