

Commonwealth Edison Company  
Dresden Generating Station  
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Tel 815-942-2920



June 28, 1996

JSPLTR #96-0100

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

Subject: Dresden Nuclear Power Station Units 2 & 3  
Summary Report for Resolution of USI A-46 (Generic Letter 87-02)  
NRC Docket Nos. 50-237 and 50-249

- References:
- (1) "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46 (Generic letter 87-02)," dated February 19, 1987, U.S. Nuclear Regulatory Commission.
  - (2) "Supplement No. 1 to Generic Letter (GL) 87-02 that transmits Supplemental Safety Evaluation Report No. 2 (SSER No. 2) on SQUG Generic Implementation Procedure, Revision 2, as Corrected on February 14, 1992, (GIP)," dated May 22, 1992, U.S. Nuclear Regulatory Commission.
  - (3) "Generic Implementation Procedure (GIP) for Seismic Verification of Nuclear Plant Equipment," Revision 2, Corrected 2/14/92, Seismic Qualification Utility Group (SQUG).
  - (4) ComEd letter to the U.S. Nuclear Regulatory Commission, "Response to Supplement 1 to Generic Letter (GL) 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors", SQUG Resolution of USI A-46, dated September 21, 1992
  - (5) ComEd letter to the U.S. Nuclear Regulatory Commission, "NRC Evaluation of the Commonwealth Edison Response to Generic Letter 87-02, Supplement 1, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors", SQUG Resolution of USI A-46, dated January 15, 1993
  - (6) D. Chrzanowski (ComEd) letter to T. Murley (U.S. NRC), dated March 9, 1993.

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In Reference (1), the NRC Staff set forth the process for resolution of USI A-46 and encouraged the affected nuclear power plant licensees to participate in a generic program. In Reference (2), the Staff required a response to include a commitment to the Generic Implementation Procedure (GIP-2) Reference (3), prepared by the Seismic Qualification Utility Group (SQUG), a schedule for the implementation of the GIP, and submission of a report summarizing the results of the USI A-46 program. In the Reference (4), (5) and (6) letters to the NRC Staff dated September 21, 1992, January 15, 1993 and March 9, respectively, ComEd committed to implement GIP-2, including clarification, interpretations, and exceptions in SSER-2, and to communicate to the NRC Staff any significant or programmatic deviations from GIP guidance.

This letter forwards the results of the USI A-46 evaluation for the Dresden Nuclear Power Station, Units 2 and 3. This letter also confirms that no significant or programmatic deviations from the GIP guidance were made during the USI A-46 resolution process.

### **USI A-46 REPORTS**

Section I.2.2.8 of GIP-2 requires that a plant-specific Summary Report be submitted to the NRC Staff, including a proposed schedule for future modifications and replacements of those outliers which are yet to be resolved. Further, GIP-2 Section II.9 provides for Safe Shutdown Equipment List (SSEL), Relay Evaluation, Seismic Evaluation and Completion Reports. This letter constitutes the Summary Report. Attachment 1 includes the Seismic Evaluation Report and Attachment 2 includes the Relay Evaluation Report. As permitted in GIP-2 Section II.9.2, the pertinent results from the SSEL are included in the attached Seismic Evaluation and the Relay Evaluation Reports. To permit both the Seismic and Relay Evaluation Reports to be reviewed independently, there are a few areas of redundancy between these reports, e.g., a description of Safe Shutdown Equipment is included in both reports. The Completion Report will be submitted when all the planned actions for resolution of USI A-46 have been completed as described below.

### **OUTLIERS**

Outliers, which are not deficiencies against the plant's licensing or design basis, as defined by GIP-2, were identified during the seismic and relay reviews. These outliers are described in detail in the attached reports.

The schedule for resolution, future modifications and replacements of those outliers, which have not yet been resolved, is provided in the attached reports. ComEd will resolve all of the outliers for both Units within two (2) refueling outages per unit following receipt of an NRC Safety Evaluation Report (SER) on the USI A-46 submittal.

June 28, 1996

To the best of my knowledge and belief, the information contained in this document is true and correct. Such information has been reviewed in accordance with site practice and I believe it to be reliable.

If you have any questions, please contact Frank Spangenberg, Dresden Regulatory Assurance Manager at (815) 942-2920, extension 3800.

Sincerely,



J. Stephen Perry  
Dresden Station Vice President

Attachments:

- (1) A-46 Seismic Evaluation Report for Dresden Nuclear Power Station, Units 2 & 3
- (2) A-46 Relay Evaluation Report for Dresden Nuclear Power Station, Units 2 & 3

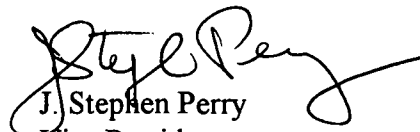
cc: H.J. Miller, Region III Administrator  
J. F. Stang, Project Manager, NRR  
C. L. Vanderniet, Senior Resident Inspector, Dresden  
Office of Nuclear Facility Safety - IDNS

STATE OF ILLINOIS )  
COUNTY OF WILL )  
IN THE MATTER OF )  
COMMONWEALTH EDISON COMPANY )  
DRESDEN - UNITS 2 & 3 )

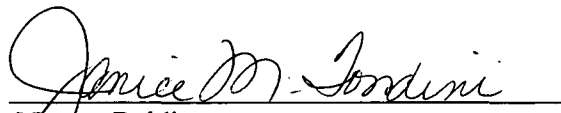
Docket Nos. 50-237  
50-249

### AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

  
J. Stephen Perry  
Vice President  
Dresden Station

Subscribed and sworn to before me, a Notary Public in and  
for the State and County above named, this 28th day of  
June, 1996. My Commission expires on  
February 21, 1997.

  
Notary Public

