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October 8, 1996

JSPLTR: 96-0182

U. S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3 Supplemental Response to NRC Bulletin 95-02, "Unexpected Clogging of a Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Pool Cooling Mode."
NRC Docket Numbers 50-237 and 50-249

Reference: I. Johnson letter to Document Control Desk, dated November 14, 1995 transmitting Dresden Station Unit 2 and 3 response to NRC Bulletin 95-02.

The reference letter provided Dresden Station's response to NRC Bulletin 95-02, "Unexpected Clogging of a Residual Heat Removal (RHR) Pump Strainer While Operating in Suppression Cooling Mode."

In the response it was noted that Dresden Station Unit 3 was in a short forced outage (D3F20) with the Primary Containment inerted. On November 1, 1995, LPCI was aligned for 3-pump operation in accordance with DOS 1500-05, "LPCI System Quarterly Flow Rate Test", and the pumps were run for an extended duration of six hours, approximately six torus water inventory turnovers. Pump suction pressure and flow was trended for the duration of the test with no decrease in flow rate and insignificant change in suction pressure. Based on the extended pump test and the practice of torus cleaning during refueling outages, the strainers were not inspected but would be during the next outage of sufficient duration. An outage of sufficient duration was determined to be one that would exceed 14 days in duration.

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On May 15, 1996, Unit 3 entered a short outage (D3F21) that was going to exceed 14 days. Plans were made to enter the Unit 3 torus and inspect the ECCS suction strainers. The as found condition of the strainers, prior to conducting multiple pump flow tests, had significant fouling. The material collected on the strainers appeared to be similar to the material found on the Unit 2 strainers when they were inspected in February, 1996. Starting on May 25, 1996, and continuing through May 29, 1996, three ECCS multiple pump flow tests were performed to assure suppression pool and ECCS suction strainer cleanliness. Prior to the start of testing and after each pump flow test, the strainers were inspected and cleaned by a diver. The tests were performed under DOS 1500-05, "LPCI System Quarterly Flow Test," or in conjunction with special procedures already approved for multiple pump operations. Three pumps were run in excess of 4 hours, to assure four (4) turnovers of torus water inventory. Pump suction and discharge pressures were monitored during each test and found acceptable. The final test was performed on May 29, 1996. Upon completion of the final test, the strainers were inspected by a diver. Based on the guidance provided by the BWROG, the results of the testing, and the diver inspection, it was determined that the strainers were clean [i.e. showed no more than trivial (on the order of 1% or less surface area coverage) debris accumulation] within the BWROG acceptance criteria. At the completion of the Unit 3 ECCS suction strainer inspection, Dresden successfully performed DOS 1600-19, "Suppression Chamber Closeout Inspection."

The Bulletin 95-02 required response was for these confirmatory tests and inspections to be reported within 10 days of completion. Due to administrative error, this requirement was not met. Commonwealth Edison apologizes for any inconvenience this may have caused. Appropriate corrective actions will be implemented to minimize the possibility of similar future problems.

If there are any questions concerning this letter, please refer them to Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920, extension 3800.

Very Truly Yours,



J. Stephen Perry
Site Vice President
Dresden Station

JSP/RLS:pt

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