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Dresden Generating Station
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December 17, 1996

JSPLTR# 96-0241

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

Subject: Dresden Station Units 2 and 3
Implementation Status of the
Station Blackout Rule (SBO) Commitments
NRC Docket Nos. 50-237 and 50-249

- References
- (a) L. N. Olshan (USNRC) to T.J.Kovach (ComEd) dated July 18, 1991 (Supplemental SER Approving of 1995 completion schedule)
 - (b) J. L. Schrage (ComEd) to USNRC dated September 1, 1995 (Letter requesting schedular exemption of SBO commitments to end of the next refueling outages)
 - (c) B. Rybak (ComEd) to USNRC dated November 21, 1996 (SBO schedular exemption request)
 - (d) J. F. Stang (USNRC) to D. L. Farrar (ComEd) dated December 18, 1995 (NRC Approval of the change to the Implementation Commitment for the Station Blackout Rule)

This letter transmits Commonwealth Edison Company's (ComEd's) notification to the NRC Staff of clarification of information provided in References (b) and (c). ComEd also provides a status of the 10 CFR 50.63, the "Station Blackout Rule" (SBO) implementation of the Alternate AC - Diesel Generator (AAC-DG) modification for Dresden Unit 3.

To meet the requirements of 10 CFR 50.63, ComEd committed to install two AAC-DGs at Dresden Station by December 31, 1995. The NRC Staff (the Staff) provided approval of this schedule in Reference (a). Although ComEd made significant progress toward completion of SBO by the original commitment date, ComEd requested relief from the scheduled completion in References (b) and (c), and received (NRC) Staff approval in the Reference (d).

Within Reference (a), ComEd indicated 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.

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Dresden Unit 2 is currently in operation with all Unit 2 SBO commitments completed. Dresden Station is now equipped with an additional on-site AAC source, as well as increased operational flexibility provided by the cross-tie of 4kV safety buses between units. These enhancements increase safety margins. The large capacity of the Unit 2 AAC DG 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. Therefore, the safety significance of the additional delay is minimal.

Unit 3 is currently in Operating Cycle 14. ComEd is moving the start of the fourteenth refueling outage (D3R14) to April 1997. All physical work has been completed associated with the Unit 3 SBO Diesel Generator, the new SBO 4kv Switchgear and the tie-ins to the existing 4Kv switchgear. This work was completed during the 1996 forced outage which began on June 20, 1996.

The remaining work on Unit 3 requires the creation of extensive testing procedures for both non-outage and outage related testing. The non-outage testing is estimated to take 2 months. The outage related testing requires complete de-energization of the 4Kv Buses 33 and 34. These buses provide the normal power supply to the 4 Kv Emergency Buses (33-1 and 34-1, respectively). 4Kv Buses 33-1 and 34-1 provide power to the (Low Pressure) Core Spray (CS) and the Low Pressure Coolant Injection, (LPCI) and the Shutdown Cooling (SDC) systems.

Unit 3 has experienced several additional forced outages of lengths that varied from 2 weeks to 5 months. The 5 month forced outage in 1995 was necessary to replace failed turbine blades on the Main Turbine. Prior to the current forced outage, there has been 2 other forced outages on Unit 3 in 1996. A 3 month outage (06/20/96 - 09/23/96) was necessary to upgrade 4Kv breakers. During this outage, LPCI Corner Room Steel was restored to within UFSAR requirements and 100% of the remaining physical work associated with the SBO facility changes were completed.

Completion of the SBO modifications requires the services of uniquely qualified individuals, familiar with the design of the associated facility changes as well as the Dresden 4Kv bus control logic. Many of these individuals were needed to support the 4Kv breaker upgrades performed on both Unit 2 and Unit 3 during the forced outages on Units 2 and 3 during the summer of 1996. These individuals could not be dedicated to Unit 3 until after the completion of Unit 2 SBO commitments (April 1996)

In Reference (d), the Staff implied that SBO modifications would be completed in 1996. Dresden wishes to clarify, as stated in References (b) and (c), that completion of the SBO modifications (facility changes and testing) has been dependent on plant configurations scheduled for a refueling outage (D3R14), not tied to a specific date. SBO will be authorized for operation prior to startup of Unit 3 from D3R14.

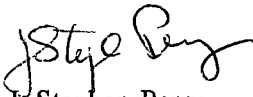
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To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor 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 Frank Spangenberg at (815) 942-2920 Extension 3800.

Respectfully,



J. Stephen Perry
Site Vice President
Dresden Station

cc: W. Beach, Regional Administrator - RIII
J. F. Stang, NRR Project Manager - Dresden
C. L. Vandiermiet, Senior Resident Inspector - Dresden
Office of Nuclear Facility Safety - IDNS