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Dresden Generating Station  
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December 18, 1996

JSPLTR 96-0242

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

**SUBJECT:** Dresden Nuclear Power Station Units 2 and 3  
Administrative Limit Imposed on Standby Gas Treatment System  
Charcoal Efficiency Due to Secondary Containment Net Free Volume  
Concern  
NRC Docket Nos. 50-237 and 50-249

The purpose of this letter is to inform you of interim administrative measures being applied at the Dresden Nuclear Power Station to address a concern regarding the secondary containment net free volume assumed in the control room habitability design basis calculations.

On August 21, 1996, a concern with the net free volume of the secondary containment of Units 2 and 3 of Dresden Station was identified, specifically, the volume is less than that assumed in the control room habitability analyses. The free volume of the secondary containment is utilized in the control room habitability analyses as a volume into which significant releases occur. The size of the volume, and the Standby Gas Treatment System (SBGT) flow rate from the volume, act as a delaying function in the release of radio-nuclides to the surrounding environs. The reduced secondary containment volume has a non-conservative effect on the control room habitability design basis analyses used to demonstrate compliance with the limits of General Design Criteria (GDC) 19.

As a conservative measure, ComEd reviewed the analyses and determined that by crediting the SBGT charcoal with 93% removal of radio-iodines, the current analyses methodology demonstrates facility compliance with the existing design bases calculation. The current Technical Specification limit on SBGT charcoal filter efficiency is for less than 10% methyl iodide penetration (greater than or equal to 90% efficiency in removal of methyl iodide). The actual SBGT efficiencies when last measured were greater than 99%, demonstrating that the facility is being operated conservatively with respect to the design and licensing basis.

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ComEd believes that when more realistic post-accident habitability analyses are performed using methodologies described in the Standard Review Plan, the existing Technical Specification limit of 90% will be adequate to preserve the margin of safety which is currently described in the facility design and licensing bases.

However while the analyses are being performed, ComEd has conservatively applied SGBT charcoal filter efficiency limit of greater than or equal to 93%. This limit will remain in effect until a new habitability analyses has been completed and approved. No permanent changes to the facility Technical Specification surveillance limits are expected to be required, and no plans currently exist to submit a request for a license amendment. The administrative limit being imposed is consistent with the current Technical Specifications.

The habitability analyses is scheduled for completion by April 7, 1997. If additional approval of methodologies or assumptions is required, ComEd will pursue approval to support removal of this administrative limit on operations.

If you have any questions, please contact Frank Spangenberg, Regulatory Assurance Manager.

Sincerely,



Stephen Perry  
Site Vice President  
Dresden Station

JSP/KB:pt

cc: A. Bill Beach, Regional Administrator, Region III  
NRC Resident Inspector's Office  
J. Stang, Dresden Project Manager