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Dresden Generating Station  
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December 19, 1996

JSPLTR #96-0244

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

Subject: Dresden Station Unit 3  
Nitrogen Makeup System Capability Concern  
NRC Dockets 50-249

- Reference:
- a) K. R. Goller (USNRC) letter to J.S. Abel (ComEd) dated April 19, 1974 (NRC Approval of Technical Specification Change 28 (Unit 2) and Change 19 (Unit 3))
  - b) B. Lee (ComEd) letter to D.J. Skovholt (USNRC) letter dated February 20, 1973
  - c) J.F. Stang (USNRC) to D.L. Farrar (ComEd) letter dated July 29, 1993 (SER providing the Staff's approval of facility changes to resolve Combustible Gas Control issues)

### Summary

The ISI Team raised several questions regarding the design basis of the Nitrogen Makeup System (NMS). This letter addresses and clarifies the design basis of the nitrogen makeup system which is used as the interim method for Combustible Gas Control (CGC) for Dresden Station Unit 3 until a Nitrogen Containment Atmospheric Dilution (NCAD) system is installed. This letter identifies the design basis flow requirement necessary to comply with Safety Guide 7, which was the governing standard at the time Reference (a) was issued. Please note that the NCAD system found acceptable to the staff in Reference (c) will be operational prior to startup from the fourteenth refueling outage on Unit 3, currently scheduled for the Spring of 1997.

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### **Design Requirements**

Reference (d) provided the NRC Staff approval of interim methods for post accident Combustible Gas Control within the primary containment and imposed Technical Specifications on the existing Nitrogen Makeup System. Resolution of the final CGC requirements generated considerable correspondence between ComEd and the Staff. Specifically, Reference (b) provided the ComEd response to questions raised by the Staff regarding a proposed containment dilution (CAD) system. The nitrogen makeup system was to be an interim method of controlling post accident combustible gas in the containment until the proposed CAD system was made operational. The facility was never modified to include the CAD system proposed in Reference (b) and the current nitrogen makeup system continues to be the interim system until the final facility changes have been installed.

Question 12 of Reference (b) requested a description of the design features of the proposed CAD system. ComEd's response was "...Each nitrogen supply system can deliver nitrogen to either of the containments at a maximum rate of 100 scfm using Safety Guide 7 assumptions, the maximum nitrogen supply rate required is about 32 scfm." Therefore, the current requirement for the nitrogen makeup system is 32 scfm.

### **Conclusion**

ComEd has re-evaluated the current capability of the Nitrogen Makeup System. This evaluation has determined that the Nitrogen Makeup System has the capability to deliver more than twice the required flow to the containment post accident. Therefore, the Dresden Unit 3 Nitrogen Makeup System is capable of performing within the Safety Guide 7 analysis and meets the current regulatory requirements. ComEd plans to make the NCAD system operational prior to startup from D3R14, thereby meeting the updated requirements of Regulatory Guide 1.7 analysis as required by Reference (c).

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Please address any questions concerning this matter to Frank Spangenberg,  
(815) 942-2920 Extension 3800.

Sincerely,



J. Stephen Perry  
Site Vice President  
Dresden Station

JSP/KB/ld

cc: A. Bill Beach, Regional Administrator-RIII  
J. Stang, Dresden Project Manager-NRR/PDIII-2  
C. Vanderniet, Senior Resident Inspector (Dresden)  
Office of Nuclear Facility Safety-IDNS