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ComEd

January 14, 1997

JSPLTR #97-0003

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

Subject: Dresden Nuclear Power Stations Unit 3
"Reactor Water Clean Up (RWCU) System High Energy Line Break (HELB) Outside the Drywell"
NRC Docket No. 50-249

Reference:
1) J. Hosmer (ComEd) letter to U.S. NRC dated August 27, 1996, "Reactor Water Clean Up (RWCU) System High Energy Line Break (HELB) Outside the Drywell"
2) J. Hosmer (ComEd) letter to U.S. NRC dated September 4, 1996, "Reactor Water Clean Up (RWCU) System High Energy Line Break (HELB) Outside the Drywell"
3) J. Hosmer (ComEd) letter to U.S. NRC dated December 10, 1996, "Reactor Water Clean Up (RWCU) System High Energy Line Break (HELB) Outside the Drywell"

In Reference 2, ComEd committed to installing a modification (to automatically isolate the RWCU in the event of direct indication of a HELB) by D3R15. The purpose of this letter is to answer NRC's question if earlier installation of the modification (i.e. during D3R14) is feasible. ComEd does not believe it prudent to install the modification during D3R14 and intends to retain the original commitment of installing the RWCU auto-isolate modification in Dresden Unit 3 during D3R15.

In Reference 1 ComEd provided a response to an issue that the consequences associated with a RWCU System HELB could potentially exceed the limits of 10CFR part 100 and equipment environmental qualification licensing basis. In response to the issue, ComEd instituted interim administrative controls until a full evaluation and a determination of whether Dresden Unit 3 was outside the design basis.

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In References 2 and 3 ComEd committed to modifying the RWCU system to automatically isolate on direct indication of a HELB and provided a scope and schedule for the modifications. In attachments to Reference 2, ComEd provided analysis that demonstrated that the interim administrative controls were adequate to prevent operation outside the licensing basis.

In Reference 3 ComEd proposed installing the auto-isolate modification in Unit 3 during D3R15. At that time, the conceptual design had been completed and the scope of the modification had been determined. The decision to implement the modification during D3R15 was based on the need for completion of detailed engineering design, procurement of long lead time items, physical craft work and the proximity of D3R14.

In light of the delay of D3R14 ComEd Engineering evaluated the feasibility of implementing the RWCU auto-isolate modification during the delayed D3R14. ComEd engineering has determined that the time required to complete the detailed engineering (including the equipment specification), fabrication and testing of the temperature monitoring panels would not support the installation during D3R14.

As NRC is aware pre-outage planning is a complicated and extensive process in coordination of resources and manpower. Outage planning and coordination must begin a considerable amount of time before the actual start of the outage. Without effective planning and coordination, outage work can be compromised. Attempts to rush the engineering, fabrication, testing, and installation of the modification without considerable planning would not be prudent in ComEd's opinion.

In Reference 1 ComEd committed to interim measures that would limit the amount of coolant released as well as the amount of activity released in the event of HELB. For Dresden Unit 3 ComEd committed, in Reference 3, to replacement of piping and components in the RWCU system to reduce the susceptibility for leaks in the RWCU system.

ComEd believes these factors reduce the urgency of installing the RWCU auto-isolate modification.

Sincerely,

J. Stephen Perry
Site Vice President
Dresden Station

cc: A. W. Beach, Regional Administrator, Region III
NRC Resident Inspector's Office
Illinois Department of Nuclear Safety
J. Stang, Dresden Project Manager