Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

March 6, 1997

ComEd

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Dresden Station Units 2 and 3
LaSalle Co. Station Units 1 and 2
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
Protection of Motor Operated Valves During Postulated Hot Shorts
NRC Docket Nos. 50-237, 249, 254, 265, 295, 304, 373, 374, 454, 455, 456 and 457

References:

1. NRC Inspection Report Nos. 50-237/96012 (DRS); 50-237/96012 (DRS); 50-254/96016 (DRS); 50-265/96016 (DRS), dated November 14, 1996.
2. E.S. Kraft letter (ESK-96-224) to USNRC, Response to an Apparent Violation, dated December 12, 1996.
3. J. B. Hosmer letter to USNRC, Supplemental Response to Apparent Violation, dated December 20, 1996.
4. Letter 96-016-00 for LaSalle Co.

Reference (2) provided the response to the apparent violation for Dresden and Quad Cities Stations, described in reference (1), a concern with a postulated control room fire induced "hot short" in a motor operated valve circuit. Reference (3) described the status and corrective actions being taken for this issue at the other ComEd stations.

Based on questions received from the NRC staff, the purpose of this letter is to clarify the ComEd position with respect to the actions taken to address IN 92-18, and how the contents of the Information Notice impact each stations' ability to achieve safe shutdown in accordance 10CFR50, Appendix R.

IE01

The completed ComEd re-reviews show, when postulating the event in IN 92-18, that Byron, Braidwood and Zion were always able to achieve a safe shutdown condition in accordance with their respective SSA. Dresden would be able to achieve a safe shutdown condition in accordance with their respective SSA, in all but one condition. At Dresden, if a hot short causes a spurious actuation of the Isolation Condenser isolation valve in the closed position, the valve may be damaged in that position due to the increased closing torque value established to assure valve closure as required by the GL 89-10 program. With a fire in the control room, station procedures require deenergizing the HPCI system by pulling fuses and opening circuit breakers to provide load shedding. With a damaged Isolation Condenser valve and a deenergized HPCI system, both safe shutdown paths would not be available, until the HPCI system is reenergized.

For Quad Cities, as stated in reference (2) and LaSalle, as stated in reference (4), postulating the event described in IN 92-18 would compromise achieving safe shutdown as described in the plant specific SSAs.

If there are any further questions regarding this issue, please contact me at the Downers Grove office.

Sincerely,

John B. Hosmer
Engineering Vice President
Downers Grove

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cc: A. Beach, Regional Administrator - RIII
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Office of Nuclear Facility Safety - IDNS