

Commonwealth Edison Company
Dresden Generating Station
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April 10, 1997

JSPLTR: #97-0069

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555-0001

Subject: Dresden Nuclear Power Station Units 2 and 3
Additional Information Regarding Application for Amendment to Facility
Operating Licenses DPR-19 and DPR-25, Appendix A, Technical Specifications,
Section 3/4.7.K, "Suppression Chamber," and Section 3/4.8.C,
"Ultimate Heat Sink."
Docket Nos. 50-237 and 50-249

- References:
- a) J. Stephen Perry (ComEd) to USNRC letter, dated February 17, 1997
 - b) J. F. Stang Letter (USNRC) to I. M. Johnson (ComEd), dated March 21, 1997
 - c) J. Stephen Perry to USNRC letter, dated April 2, 1997

ComEd has requested approval of changes to Facility Operating Licenses DPR-19 and DPR-25 via Reference (a). The NRC Staff requested additional information concerning the proposed amendment request in Reference (b). ComEd provided the required information in Reference (c), with the exception of results of evaluations of the torus attached piping due to the new thermal conditions. In addition, ComEd is providing a response to a request for additional information based on a phone call between the Staff and ComEd personnel on April 8, 1997. This additional information is in reference to proposed changes to the Dresden Emergency Operating Procedures.

Torus Attached Piping

Evaluations have been completed that demonstrate the Unit 2 torus attached piping, associated supports and structural attachments remain within UFSAR allowables for a post-LOCA torus temperature of 176 °F. The maximum torus temperature proposed in Reference (a) is based upon a peak post-LOCA torus temperature of 176 °F. This temperature may change as a result of future performance of the containment analysis with the addition of a 2 - sigma adder on the ANS-5.1 decay heat curves. The future performance of this analysis and completion of the Unit 3 torus attached piping evaluations is addressed in the proposed license conditions and implementation criteria provided in Attachment 2.

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Dresden Emergency Operating Procedures

ComEd will modify the Dresden Emergency Operating Procedures (DEOPs) prior to April 25, 1997, to more closely tie the overpressure requested for the time the sprays might be on, such that higher pressure will be present in containment, to provide more margin in the Net Positive Suction Head (NPSH) available. Operations personnel will be trained on the revised procedures prior to assuming shift responsibilities.

DEOP 200-1, "Primary Containment Control," will be modified to provide guidance to terminate sprays at higher than 2 psig when required to ensure adequate NPSH for the Emergency Core Cooling System (ECCS) pumps. The DEOP will contain NPSH limit curves (NPSH as a function of torus bottom pressure) to provide additional information to the operators relative to the potential for pump cavitation. These curves which are presently provided in DEOP 100, "Reactor Control," will also be included in DEOP 200-1. A copy of these curves is provided in Attachment 1. The sprays are re-initiated if pressure increases to above 9 psig. Dresden Operating Procedure 1500-03, "Containment Spray Cooling Mode of Low Pressure Coolant Injection System," will be revised to provide guidance on control of containment overpressure with sprays. This procedure will provide guidance to the operators to maintain pressure between the pressure required for adequate NPSH and 9 psig.

ComEd will provide copies of the revised procedures to the BWR Owner's Group by April 25, 1997, and request a review of these changes. ComEd will request the BWR Owner's Group review be completed by July 1, 1997.

License Condition Modification

Per Reference (c), ComEd proposed license conditions for implementation of the requested amendment. Subsequently, following NRC Staff review and based on additional conversations between ComEd personnel and the NRC Staff, the modified license condition for Units 2 and 3 relative to the revised containment analysis is provided herein as Attachment 2.

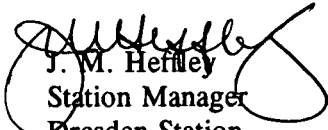
The information provided herein has been reviewed by the Onsite and Offsite review groups in accordance with Company procedures and policies.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects, these statements are not based on my personal knowledge, but on information furnished by ComEd employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

April 10, 1997

If there are any questions regarding this issue, please contact Frank Spangenberg, Dresden Station Regulatory Assurance Manager at (815) 942-2920, extension 3800.

Sincerely,


J. M. Heffley
Station Manager
Dresden Station



Signed before me on this 10 day,

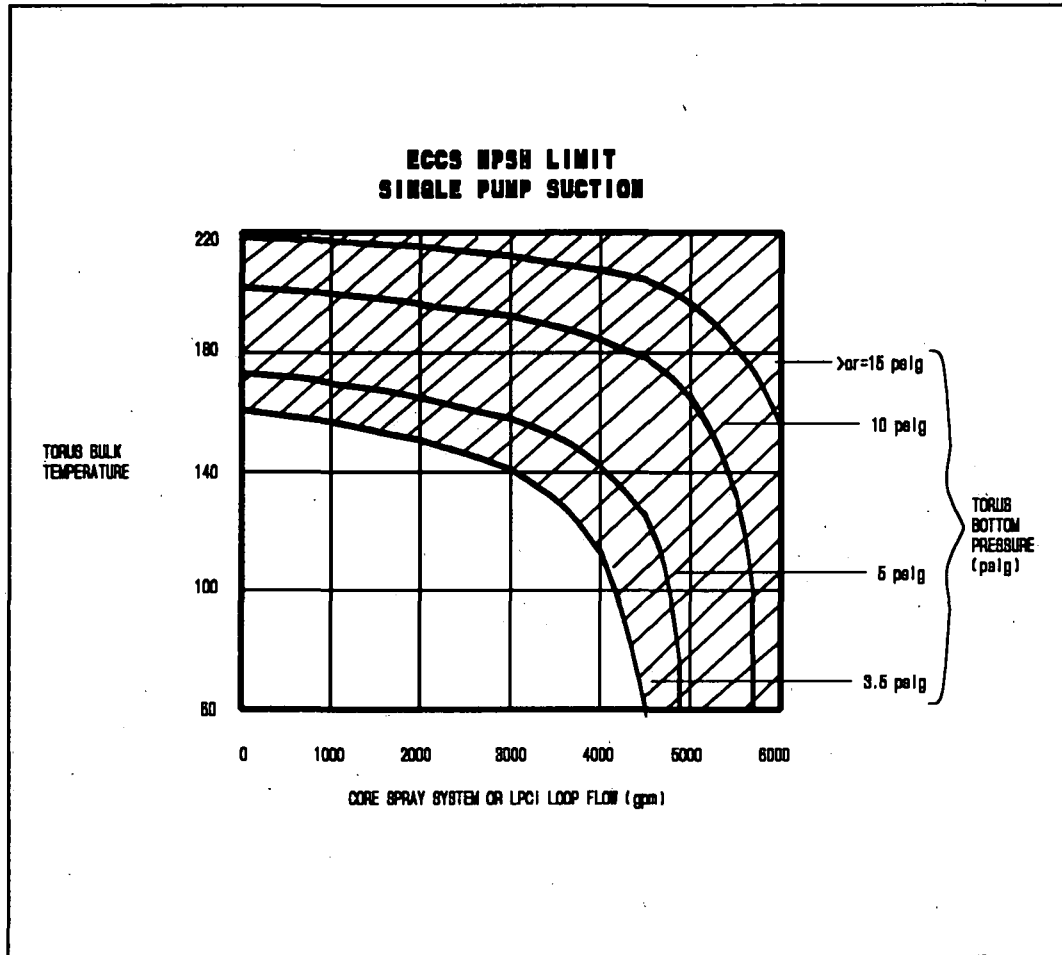
April, 1997,

by Sherry L. Butterfield
Notary Public

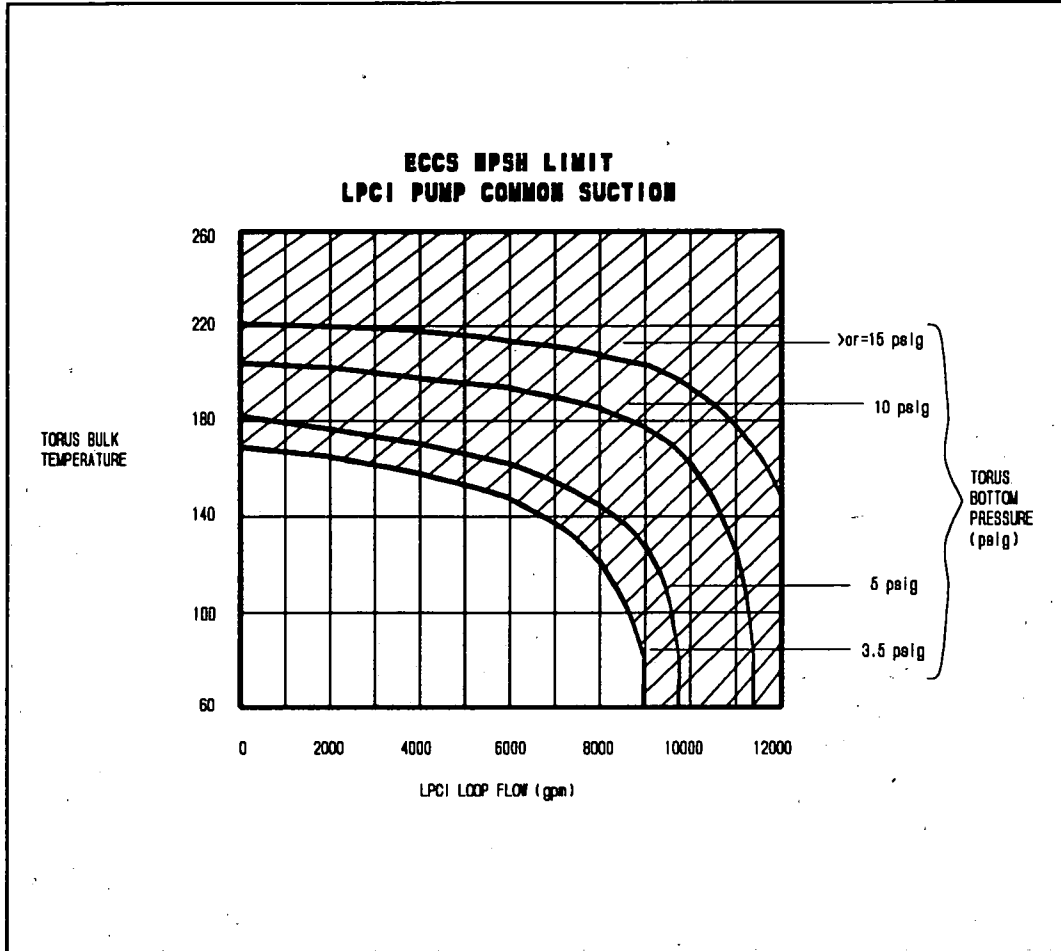
- Attachments:
- 1) ECCS NPSH Limit Curves
 - 2) Modified containment analysis license condition

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

ATTACHMENT 1 FIGURE 1



ATTACHMENT 1 FIGURE 2



ATTACHMENT 2

Modified License Condition and Implementation Criteria For Units 2 and 3

Per Reference (c), ComEd proposed license conditions for implementation of the requested amendment. Subsequently, following NRC Staff review and based on additional conversations between ComEd personnel and the NRC Staff, the license condition for Units 2 and 3 relative to the revised containment analysis is proposed to be modified as follows:

Modified License Condition

The licensee will perform a revised containment analysis using a 2 - sigma adder on the ANS - 5.1 decay heat model utilized in the licensee's amendment request submitted in J. Stephen Perry (ComEd) letter to USNRC dated February 17, 1997. This analysis must be completed within 180 days of the approval of this amendment. The revised analysis will be submitted to the NRC for review and approval upon its completion.