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Dresden Generating Station  
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September 19, 1997

JSPLTR: #97-0168

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

Subject: Dresden Nuclear Power Station Units 2 and 3  
Docket Nos. 50-237 and 50-249  
Amendments 157 and 152 to Facility to 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",  
Status of changes to BWR Owners Group Emergency Procedure  
Guidelines

Reference: (a) J. M. Heffley (ComEd) to USNRC letter dated, April 10, 1997  
(b) J. M. Heffley (ComEd) to R. A. Hill (General Electric) letter  
dated, April 25, 1997

The purpose of this letter is to provide the status of the BWR Owners Group review of  
Emergency Procedures that were revised to maintain containment overpressure per  
Dresden's License Amendments 157 and 152.

Reference (a) stated that the BWR Owners Group would be requested to review the  
revisions to Dresden Emergency Operating Procedures. This request was transmitted  
by reference (b). These revisions terminate containment spray above 2-psig  
containment pressure when required to assure adequate net positive suction head  
(NPSH) for the Emergency Core Cooling System (ECCS) pumps.

Following the June 1997 meeting of the Emergency Procedures Committee (EPC) of  
the BWR Owners Group, the EPC approved the addition of a caution which addresses  
the effect of sprays on overpressure and ECCS pump NPSH.

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Copies of the affected pages are included in the attachment.

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. Stephen Perry  
Site Vice President  
Dresden Station

Attachment: BWROG EPGs/SAGs; Pages C3 and PC2

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

## OPERATOR ACTIONS

If while executing the following steps, Primary Containment Flooding is or has been required, enter [procedure developed from the Containment and Radioactivity Release Control Severe Accident Guideline].

If while executing the following steps:

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- Suppression pool sprays have been initiated, terminate suppression pool sprays before suppression chamber pressure drops to 0 psig.
- Drywell sprays have been initiated, terminate drywell sprays before drywell pressure drops to 0 psig.

If while executing the following steps Suppression Pool Spray is required, but only if [suppression chamber pressure is above the Mark III Containment Spray Initiation Pressure Limit] [suppression pool water level is below 24 ft. 6 in. (elevation of suppression pool spray nozzles)], initiate suppression pool sprays, defeating suppression pool spray interlocks if necessary. If [drywell and suppression chamber hydrogen concentration can be determined to be below 6% and drywell and suppression chamber oxygen concentration can be determined to be below 5%] [containment hydrogen concentration can be determined to be below the containment Hydrogen Deflagration Overpressure Limit], use only those pumps not required to assure adequate core cooling by continuous injection. Sources external to the primary containment may be used only if primary containment water level and suppression chamber pressure can be maintained below Primary Containment Pressure Limit A.

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⑤

Operation of HPCI or RCIC turbines with suction temperatures above [225°F (maximum allowable cooling water temperature for HPCI or RCIC lube oil)] may result in equipment damage.

⑥

A rapid increase in injection into the RPV may induce a large power excursion and result in substantial core damage.

⑦

Reducing primary containment pressure will reduce the available NPSH for pumps taking suction from the suppression pool.