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

Subject: Clarification of Commitment Associated With the Safety Classification of Dresden Station Heating Ventilating and Air Conditioning (HVAC) systems. NRC Docket Numbers 50-237/249

References:
(a) ComEd Response to IE Bulletin 79-01B for Dresden Station Unit 3 Revision 5: June 1986
(b) E. Swartz ComEd letter to D. Eisenhut USNRC, dated December 17, 1981
(c) E. Swartz ComEd letter to D. Eisenhut USNRC, dated June 28, 1982
(d) D. Crutchfield USNRC letter to D. Farrar ComEd, dated May 11, 1983
(e) Review of design and operation of Ventilation system for SEP Plants, prepared by Franklin Research Center for the Nuclear Regulatory Commission for Dresden Unit 2, dated July 9, 1982
(f) T. Rausch ComEd letter to P. O'Conner USNRC, dated July 12, 1982
(g) NUREG-0823 (Integrated Plant Safety Assessment Systematic Evaluation Program for Dresden Unit 2), dated February 1983
(h) T. Rausch ComEd letter to P. O'Conner USNRC, dated December 13, 1982
(i) P. O'Conner USNRC letter to L. DelGeorge ComEd, dated September 2, 1982

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The purpose of this letter is to correct a long-standing Docket deficiency with respect to the Safety Classification of the Auxiliary Electric Equipment room (AEER) and other ventilation systems. During research for a Modification to the AEER, incorrect and inconsistent information related to certain Dresden ventilation systems was found on the Dresden Docket. This information was first submitted in April of 1980 as a Preliminary Report in response to IE Bulletin 79-01. The Dresden Station design basis and UFSAR have always correctly detailed system configuration.

Reference (a) stated that "Where Environmental conditions are maintained by HVAC equipment, the HVAC system is provided with redundant components and/or a backup power supply for reliable operation. Safety-Related HVAC systems are provided for the following areas:

a. Control room, Cable Spreading room, battery rooms, computer room, and Electrical Equipment room
b. Standby Diesel Generator room
c. High Pressure Coolant Injection (HPCI) room
d. Low Pressure Coolant Injection (LPCI) rooms"

The Control room ventilation system safety classification as stated in Reference (a) is not correct. In response to NUREG-0737, Item III.D.3.4, "Control Room Habitability," a Control Room Habitability report was docketed by Reference (b). This report was subsequently amended by Reference (c), which detailed the modification to the Control Room Ventilation systems. These transmittals, stated that the existing Control Room Ventilation (Train A which was designed and installed as non-safety related) would be augmented by the installation of a new train (Train B) which would serve to meet the safety-related function. In reference (d) the NRC Accident Evaluation Branch on NUREG-0737 completed a review of Item III.D.3.4 regarding "Control Room Habitability," found the control room habitability systems acceptable and enclosed a Safety Evaluation Report (SER).

The response to IE Bulletin 79-01B Reference (a), also incorrectly stated that the cable spreading room is served by a safety-related HVAC system. Dresden Station does not have a cable spreading room. Historically, the term may have been used interchangeably with the term Auxiliary Electric Equipment Room. The SEP Evaluation Reference (e) correctly stated that the AEER ventilation system was powered from a non-essential power center and could be connected to the emergency diesel generator by operator action. In reference (f), ComEd responded to a draft evaluation of the Dresden Unit 2 Ventilation system. Item G of this letter provided specific response for the Auxiliary Equipment Electrical Room (AEER) Ventilation system power supplies. This existing design was determined to be acceptable in Reference (g).

The following evaluations and enhancements have occurred or are in progress for the AEER.

- Station Blackout (SBO) Diesels have been installed and are Operations Authorized at Dresden. These diesels can provide power within one (1) hour of a Loss of Offsite Power (LOOP) event.

- A test conducted during summer operation without cooling in the AEER for two hours and twenty five minutes, found the AEER temperature increased from 78 F to 85.3 F.
- Operating Procedures are in-place for operations to manually connect the AEER HVAC loads to the diesels in the event of a LOOP within two hours.
- A new Air Conditioning system is being installed to provide additional cooling to the AEER.

Reference (a) stated that the Standby Diesel Generator Room ventilation was safety-related. The Standby Diesel Generator Ventilation fans are not safety-related; however, they are powered from the Essential Service motor control center which is supplied by its respective Diesel. This design was found acceptable in Reference (g).

The battery room ventilation systems are not safety-related as stated in Reference (a). Following a LOOP, operator action is required to restore battery room ventilation. Reference (h), supplied information regarding the amount of hydrogen generated during battery charging. In Reference (g) the USNRC concluded that the existing design was acceptable.

Reference (a) stated that the HPCI room and the LPCI rooms are provided with safety-related HVAC systems. An analysis demonstrated that the components in the HPCI and LPCI rooms can perform their safety-related functions at elevated temperatures. The safety-related cooling water to the HPCI and the LPCI room cooling units has been valved out. This is reflected in the Dresden UFSAR.

In reference (i), the NRC issued an SER for the Systematic Evaluation Program topic IX-5 Ventilation Systems for Dresden Unit 2. This SER was based on the Franklin Research Center Technical Evaluation Report (TER-C5257-410) which reflects comments provided by ComEd in Reference (c). The NRC approved the docketed design criteria for these ventilation / HVAC systems.

Dresden Station believes the SEP Evaluations are consistent with the design basis.

In summary, this letter is being submitted to correct a long-standing Docket deficiency with respect to the Safety Classification of the Auxiliary Electric Equipment room (AEER) and other ventilation systems. This information was submitted in Reference (a) in response to IE Bulletin 79-01. The Dresden Station design basis and UFSAR have always correctly detailed system configuration.

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

Sincerely,

J. Stephen Perry
Site Vice President
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Enclosure

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