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December 1, 1997

JSPLTR #97-0204

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

Subject: Dresden Nuclear Station Unit 3 Deletion of Commitment made in  
Response to NRC Safety Inspection Report for GL 89-10.  
NRC Docket No. 50-249

This correspondence is being submitted in regard to our commitment to perform differential-pressure testing for the Unit 3 High Pressure Coolant Injection (HPCI) test return valve, 3-2301-10, and minimum flow valve, 3-2301-14. The commitment was made in response to an NRC Safety Inspection Report for GL 89-10, dated 9/16/93, which was performed at the Dresden Nuclear Station. In our response, we submitted a schedule for differential-pressure testing of the specified valves. After test performance and data collection for the Unit 2-2301-10 and 14 valves, it was determined that it is impractical and unnecessary to perform differential-pressure testing on the Unit 3 valves.

Differential-pressure testing on 2-2301-10 and 2-2301-14 revealed valve factors of 0.89 and 1.02, respectively. In each case, engineering calculations used more conservative valve factors in determining the thrust settings which provide acceptable margin. The conservative valve factors were respectively applied to the engineering calculations for 3-2301-10 and 3-2301-14 valves and acceptable design margin was found to exist.

Furthermore, during previous valve differential-pressure testing, we observed a potential to challenge systems that are important to safety. The differential-pressure testing of the 3-2301-10 and 3-2301-14 is time intensive and requires prolonged operation of the HPCI system which results in increased suppression pool levels and temperatures. This condition could result in a potential to exceed the assumed primary containment pressures in the event a postulated accident occurred while suppression pool level is elevated above the required Technical Specification limits. Therefore, based on the potential challenge to operations personnel, as well as plant equipment, these tests were deemed impractical.

In light of the conservative engineering calculations which demonstrate that adequate reserve margin exist for each valve and the potential challenging condition which may be experienced as a result of this testing, differential-pressure testing will not be performed on the Unit 3-2301-10 and 3-2301-14 motor operated valves.

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If you have any questions, please contact Frank Spangenberg, Dresden Regulatory Assurance Manager at (815) 942-2920 extension, 3800.

Sincerely,



J. Stephen Perry  
Site Vice President  
Dresden Station

Enclosure

cc: A. Bill Beach, Regional Administrator, Region III  
NRC Resident Inspector's Office