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Dresden Generating Station  
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January 27, 1997

JMHLTR: 98-0029

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

**SUBJECT:** Dresden Nuclear Power Station Units 2 and 3  
Closure of Spent Fuel Pool Safety Issues  
NRC Docket Nos. 50-237 and 50-249

- Reference:**
- a) J. Hosmer (ComEd) to USNRC letter dated November 18, 1996, "Response to NRC Final Report on Spent Fuel Storage Pool Safety Issues."
  - b) J.F. Stang (USNRC) to I. M. Johnson (ComEd) dated September 26, 1996 "Resolution of Spent Fuel Storage Pool Safety Issues: Issuance of Final Staff Report and Notification of Staff Plans to Perform Plant Specific, Safety Enhancement Backfit Analysis - Dresden Nuclear Power Station (TAC No. 88094)."

In Reference a) , ComEd responded to the NRC Spent Fuel Storage Pool Issues (Reference b) and committed to make procedure enhancements to address Reference b, Issue #4 (Limited Instrumentation for Loss of SFP Coolant Events), Issue #8 (Limited SFP Decay Heat Removal Capability), and Issue #10 (Limited Instrumentation for Loss of Cooling Event). These commitments were summarized in the submittal as follows:

1. Finalizing heat exchanger performance calculations, and incorporating compensatory action into station procedures, if needed.

**Action Completed**

ComEd has completed the calculations which determined that the 2A FPC Heat Exchanger performance was degraded by less than 2% of design capacity due to exceeding the 6% design margin for tube plugging. No procedure changes were required, however, ComEd is attempting to restore the design margin by unplugging tubes that were previously plugged for conservatism. The work is currently in progress and will be completed prior to the upcoming refueling outage, D2R15.

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Furthermore, ComEd informed the NRC staff during the NRC Spent Fuel Pool Inspection visit in May of 1997 that the SDC system could not provide the flow rate to the spent fuel pool as stated in the UFSAR. Since that inspection visit, the Unit 2 SDC system flow rates were determined by testing, and calculations based on test results were performed to assure the SDC system could still maintain the Spent Fuel Pool water temperature below the UFSAR limits.

The UFSAR was subsequently revised, based on these results, under the provisions of 10CFR50.59 with no resultant Unreviewed Safety Question(s).

2. Proceduralizing local monitoring of pool level during a loss of forced spent fuel pool cooling or loss of AC power.

Action Completed

Provisions to establish localized fuel pool level monitoring during a loss of forced fuel pool cooling or AC power were incorporated into Revision 2 to DOA 1900-01 "Loss of Fuel Pool Cooling."

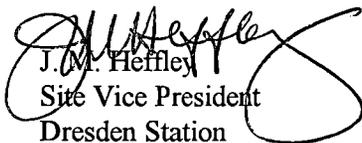
3. Proceduralizing adjustments to the Shutdown Cooling (SDC) train high-temperature alarm when the train is aligned to the spent fuel pool.

Action Completed

Provisions to make adjustments to SDC system high temperature alarm when SDC system is aligned to the fuel pool were incorporated into Revision 8 to DOP 1000-04 "Fuel Pool Cooling Mode of Operation of Shutdown Cooling System" and Revision 0 to DIP 1000-01 "Recorder TR 2(3)-1040-2 Alarm Setdown for Fuel Pool Cooling."

ComEd has no further actions related to the NRC known concerns with Spent Fuel Pool Cooling systems safety. Please address any questions concerning this matter to F. Spangenberg (815) 942-2902 extension 3800.

Sincerely,

  
J.M. Heffley  
Site Vice President  
Dresden Station

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