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**ComEd**

February 03, 1998

JMHLTR #98-0034

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

Subject: Dresden Nuclear Station Revision to Commitment Which Requires a  
Licensee Event Report for As-Found Test Data for Main Steam Line  
Safety Valves Exceeding Technical Specifications Tolerances  
NRC Docket Nos. 50-237 and 50-249

This correspondence is being submitted to revise commitments made by Dresden Station in Licensee Event Reports (LERs) 50-237/90-021, dated January 7, 1991 and 50-237/96-004, Revision 1, dated August 15, 1996. The LERs stated that the plant procedure (DMP 200-03) which governs main steam safety valve (MSSV) testing would require an LER to be generated when the as-found lift pressure exceeds the limit (+/- 1 percent) specified in Dresden's Technical Specifications (TS). The condition was being reported as a condition prohibited by the plant's TS.

Based on a review of guidance found in NUREG 1022, "Event Reporting Systems 10 CFR 50.72 and 50.73," our current commitment to submit LERs for the above out of tolerance conditions has been reassessed.

The guidance in the NUREG specifically addresses the subject failures. The NUREG regards a single MSSV failure to have occurred at the time of discovery. However, multiple failures may indicate that the out of tolerance condition existed while the MSSVs were inservice. Therefore, Dresden's commitment to report all MSSV failures established an overly conservative reporting requirement.

The guidance specified in the NUREG will be incorporated into our current program to ensure reportable conditions are properly identified and reported in accordance with the current NRC guidance. The procedure which governs the testing of the MSSVs will be revised to require an evaluation of valve failures to determine reportability.

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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. M. Heffley  
Site Vice President  
Dresden Station

Enclosure

cc: A. Bill Beach, Regional Administrator, Region III  
NRC Resident Inspector's Office  
J.F. Stang, Dresden Project Manager