Mr. Oliver D. Kingsley, President **Nuclear Generation Group** Commonwealth Edison Company **Executive Towers West III** 1400 Opus Place, Suite 500 Downers Grove, IL 60515

SUBJECT:

REQUEST FOR ADDITIONAL INFORMATION ON THE RESOLUTION OF

UNRESOLVED SAFETY ISSUE A-46 - DRESDEN NUCLEAR POWER STATION.

UNITS 2 AND 3 (TAC NOS. M69442 AND M69443)

Dear Mr. Kingsley:

By letter dated June 28, 1996, Commonwealth Edison Company (ComEd, the licensee), provided the plant-specific summary report in accordance with its commitment relating to Generic Letter (GL) 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, USI A-46," for Dresden Nuclear Power Station, Units 2 and 3. The staff has reviewed the summary report and determined that additional information concerning operator actions is necessary to complete the review of the USI A-46 response. We ask that you respond to the enclosed request for additional information within 90 days.

Sincerely,

Orig. signed by: John F. Stang, Project Manager Project Directorate III-2 Division of Reactor Projects - III/IV Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249

Enclosure: RAI

cc w/encl: See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 20, 1998

Mr. Oliver D. Kingsley, President Nuclear Generation Group Commonwealth Edison Company Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

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Sincerely,

John F. Stang, Project Manager

Project Directorate III-2

Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249

Enclosure: RAI

cc w/encl: See next page

O. Kingsley
Commonwealth Edison Company

CC:

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REQUEST FOR ADDITIONAL INFORMATION

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

UNRESOLVED SAFETY ISSUE A-46

Reference:

Letter from Commonwealth Edison Company to NRC with a Summary Report and Attachments, dated June 28, 1996

The staff requires additional information regarding operator actions specified in the report in order to make a safety determination.

- Describe what reviews were performed to determine if any local operator actions required to safely shutdown the reactor (i.e., implement the SSEL) could be affected by potentially adverse environmental conditions (such as loss of lighting, excessive heat or humidity, or in-plant barriers) resulting from the seismic event. Describe how staffing was evaluated and describe the reviews which were conducted to ensure operators had adequate time and resources to respond to such events.
- 2. As part of the licensee's review, were any control room structures which could impact the operator's ability to respond to the seismic event identified? Such items might include but are not limited to: MCR ceiling tiles, non-bolted cabinets, and non-restrained pieces of equipment (i.e., computer keyboards, monitors, stands, printers, etc.). Describe how each of these potential sources of interactions has been evaluated and describe the schedule for implementation of the final resolutions.
- 3. Describe what reviews were performed to determine if any local operator actions were required to reposition "bad actor relays." For any such activities, describe how adverse environmental conditions (such as loss of lighting, excessive heat or humidity, or in-plant barriers) resulting from the seismic event were analyzed and dispositioned. Describe how staffing was evaluated and describe the reviews which were conducted to ensure operators had adequate time and resources to respond to such events.
- 4. Describe which of the operator actions associated with resetting SSEL equipment affected by postulated relay chatter are considered to be routine and consistent with the skill of the craft. If not considered skill of the craft, what training and operational aids were developed to ensure the operators will perform the actions required to reset affected equipment?
- 5. Assume the alarms associated with " bad actor relays" are expected to annunciate during the seismic event. Do the operators have to respond to those annunciators and review the annunciator response procedures associated with them for potential action? How would those additional actions impact the operators ability to implement the Normal, Abnormal, and Emergency Operating Procedures required to place the reactor in a safe shutdown condition?
- 6. To the extent that Normal, Abnormal, and Emergency Operating Procedures were modified to provide plant staff with additional guidance on mitigating the A-46 Seismic Event, describe what training was required and provided to the licensed operators, non-licensed operators, and other plant staff required to respond to such events.