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March 13, 1998

JMHLTR: #98-0069

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

Subject: Design Basis Initiative Program
Dresden Nuclear Power Station
Commonwealth Edison Company Unit 2 and Unit 3
Docket Nos. 50-237 and 50-249

Reference: (a) J.M. Heffley (ComEd) to USNRC letter date January 30, 1998,
"Design Basis Initiative Program"

The purpose of this letter is provide additional information regarding a proposed licensing amendment addressing Design Basis Initiative (DBI) issues concerning dam failure, Containment Cooling Service Water (CCSW), and Low Pressure Coolant Injection (LPCI) systems. Per Reference (a), ComEd has scheduled the submittal for March 1998 to facilitate completion of a probabilistic safety assessment and associated engineering reviews. ComEd continues to comply with the Technical Specifications and regulatory requirements.

During our meeting with NRC representatives at Region III headquarters on March 4, 1998, ComEd identified several discrepancies in Section 9.2.5.3.2 "Dam Failure Coincident with a LOCA" of Dresden's Updated Final Safety Analysis Report. This section describes how Dresden would respond to an earthquake that caused a dam failure, loss of all Seismic Class II systems, loss of offsite power, and a design basis loss-of-coolant accident (LOCA). These discrepancies include:

- All current LOCA analyses are based on 2 CCSW pumps, not 1 CCSW pump as described in Section 9.2.5.3.2.
- All current LOCA analyses are based on starting CCSW pumps and initiating the LPCI mode of containment cooling within 10 minutes after a LOCA, not 2 hours as described in Section 9.2.5.3.2.
- The electrical breakers for the traveling screen refuse pumps which are used to refill the compartment for the CCSW pump suction lines are Seismic Category II and may not be available following an earthquake.

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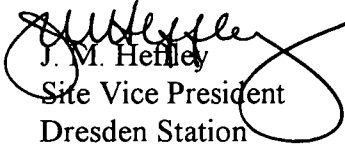


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A review of Dresden's design criteria indicates that postulating a dam failure coincident with a LOCA was not part of its original design basis. Section 9.2.5.3.2 is based on ComEd's response to AEC Question I.F on the original FSAR (Amendment 9/10). ComEd is currently preparing a Proposed License Amendment to clarify the licensing basis with respect to dam failure. This Proposed License Amendment will be sent to the NRC in March 1998.

If you have any questions concerning this issue, please contact Mr. Russell Freeman, Dresden Station Site Engineering Manager, at (815) 942-2920, ext. 3700.

Sincerely,


J. M. Hefley
Site Vice President
Dresden Station

cc: A. B. Beach, Administrator NRC Region III
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