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September 8, 1998

JMHLTR: #98-0242

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Status of Design Basis and Calculation Validation Efforts

- References:
- 1) Letter from J. S. Perry (ComEd) to USNRC, dated November 8, 1996.
 - 2) Letter from T. J. Maiman (ComEd) to U.S. NRC, "Programs to Improve the Quality, Maintenance, and Accessibility of the Design Bases at ComEd Nuclear Stations," dated November 12, 1996.
 - 3) Letter from J. S. Perry (ComEd) to U.S. NRC, "Design Basis Initiative Program," dated November 17, 1997.
 - 4) Letter from T. J. Maiman (ComEd) to U.S. NRC, "ComEd Plan for Upgrading the Quality and Access to Design Information at all Six Nuclear Stations," dated January 30, 1997.
 - 5) Letter from J. S. Perry (ComEd) to U.S. NRC, "Confirmatory Action Letter (CAL) Action Item Update," dated May 30, 1997.

As discussed in Reference 1 and 2, we committed to perform design basis and calculation validation and/or reconstitution for the twelve systems most important from a risk perspective. The original schedule targeted reconstitution/revalidation for six of these systems to be completed by the end of 1997 and the remaining six to be completed by the end of 1998. The purpose of this letter is to update the NRC on this status of this work.

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All activities associated with the six-system validation and/or reconstitution for 1997 were completed in 1997, except as noted in Reference (3). All activities associated with the six-system validation and/or reconstitution for 1998 will be completed in 1998 except as noted below.

We are performing an Updated Final Safety Analysis Report (UFSAR)-design basis accuracy review as part of our corporate Design Basis Initiative (DBI) program at all of our stations in accordance with Reference 4. At the beginning of 1998 the effort at the Dresden Nuclear Power Station was aligned with the corporate program. Accordingly, most of the activities identified in Reference (1) are being performed for essentially all systems described in the UFSAR. This has significantly broadened the verification effort at the Dresden Nuclear Power Station, from the original commitment of 12 systems to essentially all systems discussed in the UFSAR.

We have reviewed our schedule for the DBI program as it applies to the Dresden Nuclear Power Station. We have made adjustments to the schedule to complete the remaining seventeen critical calculations for the last six systems, as discussed in Attachment 1 of Reference (5) and the program in the area of the DBDs. We intend to complete these remaining calculations in the second quarter of 1999.

If there are any questions concerning this letter, please refer them to Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920, extension 3800.

Sincerely,



J.M. Heffley
Site Vice President
Dresden Station

cc: Regional Administrator, NRC Region III
Senior Resident Inspector – Dresden Nuclear Power Station