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September 21, 1998

JMHLTR #98-0244

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 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: Revision to the Schedule for the Reactor Water Clean-Up Facility Changes

- References:
- 1) J.B. Hosmer (ComEd) to USNRC letter dated December 10, 1996
 - 2) J. S. Perry (ComEd) to USNRC letter dated January 14, 1997
 - 3) R.M. Pulsifer (USNRC) to I.M. Johnson (ComEd) letter dated February 18, 1997
 - 4) J.B. Hosmer (ComEd) to USNRC letter dated August 27, 1996
 - 5) J.M. Heffley (ComEd) to USNRC letter dated March 3, 1998

The purpose of this letter is to inform the NRC of a change to the implementation schedule for the facility changes needed to provide an additional automatic isolation of the Reactor Water Clean-up (RWCU) on a High Energy Line Break (HELB) outside the drywell.

After considerable discussion with the NRC (References 1 through 5), Commonwealth Edison (ComEd) Company committed to begin installation of automatic isolation capability on the RWCU systems during the 15th refueling outages for Dresden Nuclear Power Station Units 2 and 3 (D2R15 and D3R15, respectively). Specifically, the remaining Dresden Nuclear Power Station Unit 2 work will be completed after D2R15 is on line upon receipt of ordered parts. Unit 3 work is intended to be completed during D3R15.

The required parts for Unit 2 have been received and the post-outage work was scheduled to begin in July, 1998 and was scheduled to have been completed by September 15, 1998. Subsequently, the following concerns have arisen.

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- At Dresden Nuclear Power Station, the number of automatic scrams in the past several months has increased our sensitivity to high-risk activity. The work associated with this modification is conducted in several control panels that house sensitive components that could initiate an automatic scram or actuate Emergency Core Cooling System (ECCS) equipment if bumped or if a wiring termination error were made. Wiring changes associated with the modification will be performed on some Group 1 isolation relays and Group 3 RWCU isolation circuitry.
- The testing associated with this modification impacts Group 1 isolation circuitry and Group 3 RWCU isolation circuitry. The testing is quite detailed and complex. To complete the testing, three procedures must be executed, two of which are system functional logic tests.

In view of the high-risk activity associated with these tasks, the remaining portion of the Unit 2 modification will be installed and operationally authorized during the 16th refueling outage for Unit 2. This outage is currently scheduled to start in November 1999. The Unit 3 modification will be installed during the 15th Unit 3 refueling outage scheduled to start in January 1999.

ComEd continues to maintain the compensatory actions specified in Reference 4. In addition, ComEd has replaced piping susceptible to intergranular stress corrosion cracking (IGSCC) in the RWCU system, thereby reducing the probability of a RWCU piping break outside the drywell.

ComEd will continue with the design, parts procurement, and installation preparation to ensure the Unit 3 modification will be successfully installed and tested during the upcoming 15th (D3R15) refueling outage. This will assure the completion of the Unit 3 RWCU system modification in accordance with the dates specified in Reference 1.

If you have any questions, please contact Frank Spangenberg, Dresden Regulatory Assurance Manager, at (815) 942-2920 extension 3800.

Sincerely,


Preston Swafford
Dresden Station Manager

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