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Dresden Generating Station  
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May 6, 1999

PSLTR 99-0037

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington DC, 20555-0001

Dresden Nuclear Power Station, Unit 3  
Facility Operating License No. DPR-25  
NRC Docket No. 50-249

**Subject:** Response to Request for Additional Information Regarding the Request for Notice of Enforcement Discretion Concerning Main Steam Safety Valve Technical Specifications Actions

**Reference:** Letter from P. D. Swafford (ComEd) to U.S. NRC, "Request for Notice of Enforcement Discretion Concerning Main Steam Safety Valve Technical Specifications Actions," dated May 4, 1999.

This letter provides additional information requested by the NRC during a teleconference between representatives of Commonwealth Edison (ComEd) Company and the NRC on May 5, 1999. As discussed during the teleconference, this letter provides clarification of the reference letter submitted following verbal approval of a Notice of Enforcement Discretion (NOED) by the NRC on May 4, 1999.

There are nine safety valves installed at Dresden Nuclear Power Station, Unit 3; eight (8) American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code safety valves, and one (1) combination safety/relief valve, a Target Rock Safety Relief Valve (SRV). The original licensing basis analysis, as documented in Dresden Updated Final Safety Analysis Report (UFSAR), Section 5.2.2.2.1, states that only three (3) safety valves are needed to conform to the ASME B&PV Code overpressure requirements. We have not performed a recent analysis to confirm the minimum number of safety valves required to meet the ASME B&PV Code since the original analysis. However, we have no reason to question the validity of the conclusion reached in the original design calculations for the minimum number of safety valves required by the code.

Cycle specific analysis is performed for the ASME B&PV Code overpressure event to confirm that full power operation along with the postulated event will not exceed 110% of the design pressure in the reactor coolant system. The analysis assumes that eight

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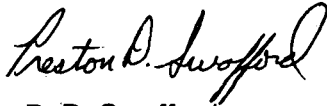
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code safety valves are available, but excludes availability of the Target Rock SRV. This cycle specific analysis does not determine the minimum number of safety valves required to meet the ASME B&PV Code limits; rather, the cycle specific analysis demonstrates considerable pressure margin to the code limit with eight safety valves. Therefore, the minimum number of safety valves required to mitigate the consequences of the ASME B&PV overpressure event remains three, as described in the UFSAR, Section 5.2.2.2.1.

Should you have any questions concerning this letter, please contact Mr. Dale Ambler at (815) 942-2920, extension 3800.

Respectfully,



P. D. Swafford  
Station Manager  
Dresden Nuclear Power Station

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