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September 2, 1980

Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Subject: Dresden Units 1 & 2
SEP Topic V-5, Reactor Coolant Pressure
Boundary Leakage Detection
NRC Docket 50-10/237

Dear Mr. Crutchfield:

In response to your letter of June 12, 1980 to Mr. D.L. Peoples, Commonwealth Edison has reviewed your evaluation of the above referenced SEP topic. In regards to the evaluation Edison has the following comments.

Dresden 2

Dresden 2 has an air sampling system of the drywell. The system is described in the FSAR, Amendment 14, Question B.14. The amendment in part states:

"Each drywell is equipped with 24 air sampling points, and each suppression chamber with one sampling point. For the leak detection mode of operation, one or two of the air sample points would be in service. Each half-inch tube will take an air sample from a selected point within the drywell. The air sample will be drawn through the tubing, out through a drywell penetration, auto-isolation valves, and then to a continuous air monitor. This air monitor will count gross beta activity which will be recorded, and alarm on an increase. This provides an indication that a leak has occurred."

Edison believes once this system is reviewed, Dresden 2 will be in compliance with the intent of Regulatory Guide 1.45.

Dresden 1

The Dresden Unit 1, Technical Specification, Station 3.6.D requires the following leak detection systems be operable whenever irradiated fuel is in the reactor vessel and the temperature is greater than 212°F.

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- a. The continuous air monitor on the 529-foot elevation in the sphere and its control room alarm;
 - b. The continuous air monitor on the sphere exhaust air discharge and its local alarm; and
 - c. Sampling systems:
 1. The continuous dew-point monitor sampling subsystem and its associated control room alarm and
 - 2) The continuous air particulate composite sampling subsystem, which is connected to the discharge line of the dew-point monitoring system.
- P A035 5/10

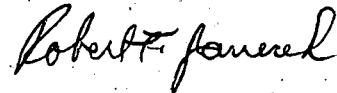
In addition, the reactor enclosure drain tanks are instrumented with high-level alarms, thus indicating the inability of the drain tank pumps to maintain normal levels. A high-level alarm could be an indication of excessive leaks within the reactor enclosure or of pump failure.

Edison believes once these systems are reviewed, Dresden 1 will be considered to be in compliance with the intent of Regulatory Guide 1.45.

Please address any questions you may have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this transmittal letter are provided for your use.

Yours very truly,



R.F. Janecek
Nuclear Licensing
Administrator
Boiling Water Reactors