



Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

October 6, 1980

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

Subject: Dresden 2
 SEP Topic III-10.A, THERMAL OVERLOAD PROTECTION FOR
 MOTOR
 OPERATED VALVES
 NRC Docket 50-237

Reference a): Dennis M. Crutchfield, August 12, 1980 letter
 to D.L. Peoples

Dear Mr. Crutchfield:

Commonwealth Edison has reviewed and concurs with the facts of
 the SEP Technical Evaluation for the above referenced topic.

In reviewing the references to the report we could not find the
 additional current licensing criteria which requires:

"In MOV designs that use a torque switch to limit the opening
 or closing of the valve, the automatic opening or closing
 signal should be used in conjunction with a corresponding limit
 switch".

The above listed criteria could not be found in the references
 listed in the report. Therefore, conclusions for the report evaluation
 should not be based on the subject criteria.

Commonwealth Edison would also like to note that eliminating the
 overload protection on Dresden 2 probably is not the best solution to
 meeting the intent of Regulatory Guide 1.106. The elimination of the
 overload protection could lead to long term valve and motor damage during
 testing. It is believed frequent testing should be sufficient to
 identify any missetting of the overload and to verify operability.

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 have been provided for your use.

Very truly yours,

Robert F. Janecek

Robert F. Janecek
 Nuclear Licensing Administrator
 Boiling Water Reactors

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NPS:mnh/6966A
 cc: RIII Resident Inspector-Dresden