



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

July 15, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Supplement to Proposed Amendment
to Facility Operating License Nos.
DPR-19 and DPR-25 Concerning
Control Rod Coupling Integrity
Statement
NRC Docket Nos: 50-237 and 50-249

Reference (a): Cordell Reed letter to E. G. Case,
dated May 24, 1978.

Dear Mr. Denton:

In Reference (a), Commonwealth Edison proposed Dresden Units 2 and 3 Technical Specification changes which would limit the requirement to verify nuclear response to control rod drive (CRD) motion such that nuclear response is only required for CRD's that have previously experienced uncoupling. This change was proposed to reflect the actual intent of the March 11, 1977, amendment which was inadvertently worded incorrectly.

The following additional information is provided to enhance your review.

During normal rebuilding of CRD's, it was noted that the inner filter had to be installed correctly in order to reduce the uncoupling problem. An incorrectly installed inner filter could cause the drive to uncouple when performing the routine overtravel check once the drive reaches position 48.

Subsequent to receipt and review of General Electric Service Information Letter No. 52, Supplement 2, dated July 31, 1974, a 25-pound pull test was incorporated into the CRD overhaul procedures. Implementation of this test greatly reduces the likelihood of completing a CRD overhaul with an incorrectly installed inner filter. In the six years that this test has been in use, only 3 control rod drives have uncoupled on Unit 2 and 1 on Unit 3. Previously, as many as 4 CRD's had experienced uncoupling in a single cycle.

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H. R. Denton

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

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

Very truly yours,



Thomas J. Rausch
Nuclear Licensing Administrator
Boiling Water Reactors

cc: Region III Inspector - Dresden

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