

REQUEST FOR ADDITIONAL INFORMATION

**OPERATING REACTOR PORV  
AND ECCS REPORTS**

TMI ACTION PLAN REQUIREMENTS

COMMONWEALTH EDISON COMPANY

DRESDEN STATION UNITS 2 AND 3

NRC DOCKET NO. 50-237, 50-249

FRC PROJECT C5506

FRC/ASSIGNMENT 7

NRC CONTRACT NO. NRC-03-81-130

FRC TASKS 183, 184

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## INTRODUCTION

This Request for Additional Information (RFI) is the result of an evaluation of the information contained in the Commonwealth Edison (CE) letter dated December 31, 1980 [1] to the Nuclear Regulatory Commission (NRC) in response to NUREG-0737, Item II.K.3.17, "Report on Outages of Emergency Core-Cooling Systems Licensee Report and Proposed Technical Specification Changes" [2]. The referenced document is the only Licensee submittal received and available for review at Franklin Research Center (FRC). Preliminary evaluation revealed that additional information is needed before a final evaluation can be accomplished.

## BACKGROUND

In NUREG-0737, Item II.K.3.17, the NRC requested each licensee to submit a report detailing dates, lengths, and causes of outages for all emergency core cooling (ECC) systems for the 5 years of plant operation through 1980. The purpose of the request was to obtain a quantitative history of the unavailability of the ECC systems to help the NRC determine if cumulative outage limitations are required in technical specifications.

To clarify the issue, the report was to contain the following details on outages that occurred during the 5 years of plant operation through 1980: (1) dates and durations; (2) causes, including test and maintenance; (3) ECC systems or components involved; and (4) corrective actions taken. In addition, each licensee was to propose changes to improve the availability of ECC system equipment, if necessary.

CE responded to this request in a letter to the NRC dated December 31, 1980 [1].

## CONCERN

An ECC system unavailability or outage is one of two kinds, either unplanned or planned. Any unplanned or forced unavailability is reportable as

a licensee event report (LER). A report is not required for planned outages or unavailability for periodic or preventive maintenance and testing.

The technical specifications permit several components of the ECC systems to have substantial outage times. In addition, there are no cumulative outage limitations for ECC systems. Thus, the unavailability of an ECC system train for extended periods is not precluded.

For an evaluation of the responses to NUREG-0737, Item II.K.3.17, to be meaningful and to produce significant conclusions, the responses must be complete and accurate. They must include, for the 5 years of plant operation through 1980, not only the outage dates, durations, and causes, ECC system equipment involved, and corrective actions taken, but also outages of the diesel generators and identification of the ECC system trains affected by the outages. Outages for surveillance testing and for planned, unplanned, and preventive maintenance should also be reported. This information will be used to determine the cumulative outage time of each ECC system train per reactor year and the need for cumulative outage limitations in the technical specifications.

Reference 1 does not appear to include test and maintenance outages which contributed to cumulative ECC system unavailability. The CE response mentions only test and preventive maintenance activities when the activities uncovered an equipment malfunction.

The CE response does not provide sufficient information to satisfy the objective of NUREG-0737, Item II.K.3.17.

#### REQUEST

To enable the staff to continue its review of CE's response to NUREG-0737, Item II.K.3.17, the following additional information is required:

A complete summary of each outage for surveillance testing and preventive maintenance for the 5 years of operation reported. For each outage, include the date and duration and the ECC or diesel generator system, train, and component involved.

## REFERENCES

1. J. S. Abel (CE)  
Letter to Director of Nuclear Reactor Regulation  
Subject: Dresden 2 and 3 Responses to NUREG-0737  
December 31, 1980
2. NUREG-0737  
"Clarification of TMI Action Plan Requirements"  
NRC, November 1980