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April 1, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 3
Request that Orders Requiring
on Automatic Air Header Dump
System be Removed
NRC Docket No. 50-249



- References (a): T. A. Ippolito letter to J. Abel
dated January 9, 1981.
- (b): D. G. Eisenhut letter to All BWR
Licensees dated December 9, 1981.
- (c): T. Rausch letter to H. R. Denton
dated March 18, 1982.

Dear Mr. Eisenhut:

Reference (a) transmitted orders modifying the Dresden Station Unit 3 operating license No. DPR-25, which required the implementation of a system which initiates control rod insertion on low pressure in the control rod drive control air header. The order describes this automatic air header dump system as a short term provision which provides protection against water accumulation in the Scram Discharge Volume (SDV) headers in the event of degraded air conditions in BWR control air supply systems.

In Reference (b), the NRC transmitted the staff's Generic Safety Evaluation Report (SER) regarding BWR Scram Discharge Systems which provided criteria for permanent design changes affecting all operating G.E. BWR's. Modifications which completely satisfy these criteria have recently been completed during the current refueling outage at Dresden Unit 3. As acknowledged in the Generic SER, improved hydraulic coupling resulting from permanent modifications such as those completed at Dresden 3 will obviate the need for an automatic air header dump system. In fact, certain licensees identified in Table 1 of the SER were excluded from the air dump requirements because they already have adequate SDV - instrument volume hydraulic coupling.

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Furthermore, the modified Dresden 3 scram discharge system has been designed to automatically scram without the need for vents or drains while a maximum inleakage of 5 gpm per drive occurs from each control rod simultaneously. The system will automatically scram before sufficient volume is lost in the SDV and instrument volume, and an analysis verifying this performance has been performed. Our Reference (c) proposed Technical Specification transmittal provides a complete discussion of how the modified Dresden 3 scram discharge system meets the NRC SER Safety, Operationa, and Design Criteria.

Considering the above, we hereby request that the January 9, 1981, orders modifying the Dresden Unit 3 license be rescinded.

Please direct any questions 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

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cc: Region III Inspector - Dresden

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