



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

May 21, 1982

Mr. Dennis M. Crutchfield, Chief  
Operating Reactors Branch No. 5  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Dresden Station Unit 2  
Response to NRC Evaluation  
of SEP Topic XV-18,  
Radiological Consequences  
of a Main Steam Line  
Failure Outside Containment  
NRC Docket No. 50-237

Reference (a): D. M. Crutchfield letter to  
L. DelGeorge dated Feb. 5, 1982.

Dear Mr. Crutchfield:

Reference (a) requested that the Dresden 2 Technical Specifications be revised to conform to the radio-iodine concentration limits in the reactor coolant which are presently contained in the standard technical specifications for BWRs. We have reviewed the staff's analysis of the radiological consequences of the main steam line failure outside containment and feel that it does not provide sufficient justification for revising the Dresden Unit 2 Technical Specifications at this time.

The NRC staff's review of the radiological consequences of the main steam line break outside containment was performed using several very conservative assumptions. The staff's analysis used X/Q values representative of a ground level release for this accident, when the use of an elevated release would have properly produced values less than those assumed by the staff. Also, the staff's assumptions for the coolant release during the accident appear to be based on a 10 second closure time of the MSIVs while current Technical Specifications require MSIV closure times of less than 5 seconds. The staff also conservatively assumed that the coolant release during the accident contained 20 uCi/ml of iodine - 131, rather than the present Technical Specification limit of 20 uCi/ml gross iodine. It appears that if more realistic values for the above parameters had been assumed, the staff's analysis would have shown that the Dresden Technical Specifications provide acceptable limits for not exceeding the small fraction of the guidelines for radiological consequences at the exclusion area boundary.

8205260176P

A035  
5/10

May 21, 1982

A more detailed analysis is needed to justify a revision to the present Dresden Unit 2 Technical Specifications. We believe this analysis should be conducted before Technical Specification revisions are proposed. Furthermore, we believe that it is inappropriate to propose Technical Specification revisions for Dresden Unit 2 at this time, and that after a more detailed analysis Technical Specification revisions could be proposed for both Dresden Units at the same time if necessary.

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 are provided for your use.

Very truly yours,



Thomas J. Rausch  
Nuclear Licensing Administrator  
Boiling Water Reactors

cc: Region III Inspector - Dresden  
G. Cwalina, SEP Int. Ass. P. Manager

4176N