

MAC  
54

October 13, 1982

Docket No. 50-237/249  
LS05-82-10-035

DISTRIBUTION  
Docket  
NRC PDR  
Local PDR  
ORB Reading  
NSIC  
DCrutchfield  
HSmith  
PO'Connor  
OELD  
ELJordan  
JMTaylor  
ACRS (10)  
SEPB  
EReeves  
JZwolinski

Mr. L. DelGeorge  
Director of Nuclear Licensing  
Commonwealth Edison Company  
Post Office Box 767  
Chicago, Illinois 60690

Dear Mr. DelGeorge:

SUBJECT: NUREG-0737 ITEM II.E.4.2 (6 & 7) PURGE VENT VALVE ISOLATION  
DEPENDABILITY

Dresden Nuclear Power Station, Units 2 and 3

We have completed our review of your letters of April 14, 1982 and June 11, 1982 on the above subject. As discussed in more detail in the enclosed Safety Evaluation, we have concluded that your responses to this NUREG item are acceptable.

We have previously documented our evaluation of II.E.4.2 position 5 for Dresden Units 2 and 3 by our July 20, 1981 Safety Evaluation. The issuance of this letter and II.E.4.2 (6 & 7) Safety Evaluation resolves the technical aspects of Item II.E.4.2 for Dresden Units 2 and 3 and completes our review of this topic.

Sincerely,

Original signed by  
Thomas V. Wambach for/

Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
Division of Licensing

Enclosure:  
Safety Evaluation

cc w/enclosure:  
See next page

8210190680 821013  
PDR ADOCK 05000237  
PDR

SE 01  
DSB-WSC EX 16

OFFICE	DL: ORB #5	DL: ORB #1	DL: ORB #5				
SURNAME	PO'Connor:cc	EReeves	DCrutchfield				
DATE	10/12/82	10/13/82	10/13/82				

Mr. L. DeGeorge

- 2 -

October 13, 1982

cc

Isham, Lincoln & Beale  
Counselors at Law  
One First National Plaza, 42nd Floor  
Chicago, Illinois 60603

Mr. Doug Scott  
Plant Superintendent  
Dresden Nuclear Power Station  
Rural Route #1  
Morris, Illinois 60450

The Honorable Tom Corcoran  
United States House of Representatives  
Washington, D. C. 20515

U. S. Nuclear Regulatory Commission  
Resident Inspectors Office  
Dresden Station  
RR #1  
Morris, Illinois 60450

Mary Jo Murray  
Assistant Attorney General  
Environmental Control Division  
188 W. Randolph Street  
Suite 2315  
Chicago, Illinois 60601

Chairman  
Board of Supervisors of  
Grundy County  
Grundy County Courthouse  
Morris, Illinois 60450

John F. Wolf, Esquire  
3409 Shepherd Street  
Chevy Chase, Maryland 20015

Dr. Linda W. Little  
500 Hermitage Drive  
Raleigh, North Carolina 27612

Judge Forrest J. Remick  
The Carriage House - Apartment 205  
2201 L Street, N. W.  
Washington, D. C. 20037

Illinois Department of Nuclear Safety  
1035 Outer Park Drive, 5th Floor  
Springfield, Illinois 62704

U. S. Environmental Protection Agency  
Federal Activities Branch  
Region V Office  
ATTN: Regional Radiation Representative  
230 South Dearborn Street  
Chicago, Illinois 60604

James G. Keppler, Regional Administrator  
Nuclear Regulatory Commission, Region III  
799 Roosevelt Street  
Glen Ellyn, Illinois 60137

SAFETY EVALUATION REPORT  
DRESDEN UNITS NO. 2 AND 3  
PURGE/VENT VALVE ISOLATION DEPENDABILITY CRITERIA  
(ITEM II.E.4.2(6&7) OF NUREG-0737)

## 1.0 INTRODUCTION

As a consequence of the accident at TMI-2, implementation of a number of new requirements has been recommended for operating reactors. These new requirements are described in NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980. The staff has requested licensees to verify that these TMI action plant requirements have been met. This report provides an evaluation of the response to Action Plan Item II.E.4.2, positions 6 & 7 submitted by Commonwealth Edison, (CECo), for Dresden Units No. 2 and 3 on April 14, 1982 and June 11, 1982.

## 2.0 REVIEW CRITERIA

Position 6 requires that containment purge/vent isolation valves that do not satisfy the operability criteria set forth in Branch Technical Position CSB 6-4 or the Staff Interim Position of October 23, 1979, must be sealed closed during operating conditions 1, 2, 3, and 4, as defined in SRP 6.2.4, item II.6.f (NUREG 0800). These valves must be verified closed at least every 31 days.

Sealed-closed isolation valves may be closed manual valves, closed remote-manual valves, and closed automatic valves which remain closed after a loss-of-coolant accident. Sealed-closed purge isolation valves should be under administrative control to assure that they cannot be inadvertently opened. Administrative control includes mechanical devices to seal or lock the valve closed or to prevent power from being supplied to the valve operator.

Key-locked switches in the control room are also acceptable administrative control devices to assure that the purge/vent valves are not inadvertently opened. Checking the valve position light in the control room every 31 days is an acceptable method for verifying that the purge valves are closed.

Position 7 requires that containment purge/vent isolation valves must close on a high radiation signal. The radiation monitor(s) that provide the high radiation signal to purge/vent isolation valves must sense primary containment atmosphere. However, the location of the monitor does not have to be inside primary containment, but can be downstream of the purge exhaust valves or in a separate system that directs primary containment atmosphere to radiation monitors located outside containment and then exhausts the containment air back into containment.

The staff has determined that any purge/vent isolation valves sealed closed during plant operating modes 1 through 4, in accordance with SRP 6.2.4, Item II.6.f (NUREG 0800) satisfy the requirements of Position 7 without a radiation closure signal, since these valves are not expected to be open during an accident. Purge/vent lines that are very small and that are used very infrequently also satisfy the requirements of Position 7 without a radiation closure signal, since the amount of containment atmosphere that can be released to the environment is small and since these valves are highly reliable and also unlikely to be open if an accident releasing radiation should occur.

The evaluation of CECo's compliance with Position 7 does not include a review of radiation monitor quality, setpoint, redundancy, or isolation/separation from safety systems.

### 3.0 EVALUATION AND CONCLUSIONS

Based on our review of CECo's letters dated April 14, 1982 and June 11, 1982 we have concluded that Dresden Station, Units 2 and 3 are in compliance with both positions 6 and 7 of TMI Action Plan Item II.E.4.2.