



**Commonwealth Edison**  
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June 12, 1984

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  
NUREG-0737, Item II.K.3.16  
Reduction of Challenges and Failures  
of Relief Valves  
NRC Docket Nos. 50-237/249

References (a): D.M. Crutchfield letter to D.L. Farrar  
dated April 11, 1984

(b): J.S. Abel letter to D.G. Eisenhut  
dated May 1, 1981.

Dear Mr. Denton:

Commonwealth Edison Company (CECo) has reviewed Reference (a) and the following is our response to the three questions presented, which were:

- (1) Which, if any, of the staff recommended modifications have been implemented,
- (2) Which, if any, of the staff recommended modifications you proposed to implement,
- (3) Whether you have implemented or propose to implement any of the other modifications or actions discussed in NUREG-0737, Item II.K.3.16 or in the BWR Owners Group report.

Question (1) Response:

The staff recommended modifications are:

- (1) Low-Low Set Relief Logic System or Equivalent Manual Actions;
- (2) Lower the reactor pressure vessel water level isolation setpoint for main steam isolation valve closure from Level 2 to Level 1;
- (3) Increase safety/relief valve simmer margin; and
- (4) Preventative Maintenance Program.

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Commonwealth Edison Company has not implemented modification 1, Low-Low set, however, as part of NUREG-0737, Item I.C.1, CECO will implement the Emergency Procedures Guidelines developed by the BWR Owners Group. These procedures address the equivalent manual action identified as an option to Low-Low-Relief set. These procedures will be in place by October, 1985.

As identified in the SER attached to Reference 1, Modification 2 is not applicable to Dresden.

Simmer margin, Modification 3, applies to Target Rock type safety/relief valve. General Electric (G.E.) Service Information Letter, 196, Rev. 3 recommends a 120 psi differential pressure between the valve setpoint and normal operating pressure. Dresden normal operating pressure is 1000 psig and the Target Rock setpoint is 1124 psig, therefore, meeting the G.E. recommendation:

Likewise, CECO has in place a preventative maintenance program for the relief valves. Per the plant Technical Specifications, the relief valve setting is checked every refueling outage. In addition, the Target Rock valve is overhauled or replaced with an overhauled valve every other refueling outage. One of the four Electromatic type relief valves is overhauled as replaced with an overhauled valve every refueling outage (i.e. valve is overhauled/replaced every 72 months). The pilot solenoid is replaced with a rebuilt unit every refueling outage.

Question (2) Response:

In reference 2 of this letter CECO. stated that modifications were not necessary for Dresden because design currently meets the Owners Group criteria of 90% below that of the referenced plants probability for a stuck open relief valve. Therefore, CECO does not plan to implement recommended modifications 1 and 2.

Question (3) Response:

As part of CECO's modification program for Environmental Qualification of Electrical equipment, an analog transmitter/trip system will replace the reactor vessel level scram monitoring system. The BWR Owners Group position on NUREG-0737, Item II.K.3.16, identified numerous candidate modifications which would reduce the probability of a stuck open relief valve. The new analog transmitter/trip system being installed addresses item 3.1.4.1 of the BWR Owners Group report again decreasing the probability of a stuck open relief valve, by reducing the challenges to the relief valves.

In addition, NUREG-0737, item II.K.3.16, recommended modification number 7 states, "offset valve setpoints to open fewer valves per challenge." Currently, Dresden has two relief valves set approximately 20 psig lower than the other three reliefs, therefore, meeting this recommendation.

In light of reference 2 and the above additional information, Dresden Station Units 2 and 3 meet the Owners Group criteria for reducing challenges to the relief valves. Therefore, no further modifications are needed or planned at this time.

If you have any questions concerning this matter please direct them to this office.

One (1) signed original and forty (40) copies of this transmittal are provided for your use.

Very truly yours,



B. Rybak  
Nuclear Licensing Administrator

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cc: RIII Inspector - Dresden  
R. Gilbert - NRR