



**Commonwealth Edison**  
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July 31, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Dresden Station Unit 3  
Environmental Qualification  
of Electrical Equipment  
Request for Scheduling  
Extension  
NRC Docket No. 50-249

References (a): D.M. Crutchfield letter to L.O. DelGeorge  
dated December 29, 1982.

(b): B. Rybak letter to H.R. Denton  
dated May 21, 1984.

Dear Mr. Denton:

Commonwealth Edison Company hereby requests an extension of the scheduling requirements of 10 CFR 50.49(g) for replacement/modification of specific equipment subject to the environmental qualification (EQ) rule. Dresden Unit 3 began its refueling outage in September, 1983. Due to unexpected delays, startup of the unit was not achieved until July 24, 1984.

Due to the extensive length of this outage the next refueling outage, the second after March 31, 1982, must be moved from its originally scheduled date of March 1985. Therefore, in accordance with Commonwealth Edison's updated overhaul schedule, the next Dresden Unit 3 refueling outage is now currently scheduled to begin September 1, 1985 and, in any event will begin no later than November 30, 1985.

During the recently completed Dresden Unit 3 outage some of the required replacement work was completed. Five Limitorque Motor Operators (MO-3-202-7A,7B, MO-3-220-1, MO-3-2301-4, and MO-3-3706) were installed. In addition, replacement of all terminal blocks was completed. Replacement of all other equipment could not be done during the recently completed outage principally due to the fact that delivery dates were developed to support installation during the original Spring, 1985 outage. These items will be installed during the Fall, 1985 outage.

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A list of the equipment to be modified or replaced during the Fall, 1985 outage is as follows:

- Electric Motors
- Instrument Racks
- Motor Operators
- Position Switches
- Shield Walls
- Solenoid Valves
- Temperature Switches
- Transmitter-Trip Units


The company has been fully committed to compliance with 10 CFR 50.49. The substantial effort applied to the environmental qualification project as a whole is evidenced by the work accomplished during the recently completed Dresden Unit 3 outage and, by development of the testing programs, procurement, and replacement programs.

Despite the company's strong commitment to the installation of all equipment within the schedular requirements of 10 CFR 50.49, unforeseen problems in the startup of Dresden Unit 3 and delivery of equipment has precluded completion of this task within the time frame of 10 CFR 50.49.g.

The NRC has concluded in its safety evaluation report transmitted by reference (a) that "Continued Operation until completion of the licensee's environmental qualification program has been determined to not present undue risk to the public health and safety." The justifications for continued operation were in part repeated, supplemented, and re-submitted as Reference (b). The company is confident that continued operation of Dresden Unit 3 is justified until these required modifications can be implemented during the Fall, 1985 refueling outage.

If there are any questions regarding this matter, please contact this office.

Very truly yours,



B. Rybak  
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - Dresden  
R. Gilbert - NRR