



Commonwealth Edison
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September 10, 1987

Mr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
"Comments on the Dresden Appendix R
Alternate Shutdown Safety Evaluation"
NRC Docket Nos. 50-237 and 50-249

References (a): Letter from D.R. Muller to L.D.
Butterfield dated July 17, 1987

(b): Letter from J.J. Harrison to C. Reed
dated August 25, 1987

Dear Mr. Murley:

Commonwealth Edison Company (CECo) has reviewed the Dresden Station Units 2 and 3, Fire Protection Appendix R Safety Evaluation Report which was transmitted to us in Reference (a). This review has resulted in several items which require resolution. These items have been divided into three categories as follows:

- A - Typographical errors (see enclosed copy of SER marked as "Attachment 1")
- B - Items requiring clarification ("Attachment 2")
- C - Items requiring additional docketed information from CECo ("Attachment 3")

Attachment 1 provides a marked-up copy of the SER. Attachment 2 provides information on the items requiring clarification. Attachment 3 provides the additional information required to substantiate CECo's position on main steam isolation valve closure/spurious operation, electromatic relief valve spurious operation, and electrical isolation deficiencies.

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September 10, 1987

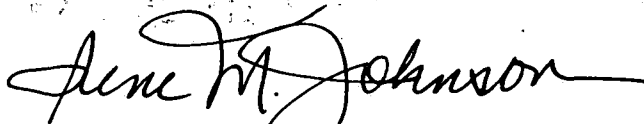
These deficiencies have been discussed in a September 1, 1987 telephone conference call with Mr. M. Grotenhuis (Dresden Licensing Project Manager) of your staff. Attachment 4 provides a list of participants in our September 1, 1987 discussion.

It should be noted that we are also providing, at this time, a revised Appendix R exemption request for the Hot Shutdown Repairs dated September 1987. This request addresses the need to remove fuses from the relief valve circuits in the Dresden Unit 2 Auxiliary Electric Equipment room and in the Unit 3 Reactor Building. The need for this revised exemption was recently identified in our preparation for the upcoming Dresden Appendix R audit.

Finally, Reference (b) requested Commonwealth Edison to inform NRC Region III of any additional exemption requests that may be in the process of being reviewed by NRR. By carbon copy, we are informing the Region of this revised exemption, as requested in their August 25, 1987 letter to us.

Please direct any questions you may have regarding this matter to this office.

Very truly yours,



I. M. Johnson
Nuclear Licensing Administrator

lm

cc: M. Grotenhuis - NRR
Dresden Resident Inspector
A.B. Davis - NRC RIII Admin.

Attachment

ATTACHMENT 1

"MARKED-UP COPY OF ALTERNATE SAFE SHUTDOWN
SAFETY EVALUATION REPORT"

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