



**Commonwealth Edison**  
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September 28, 1988

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

Subject: Dresden Station Unit 2  
"Systematic Evaluation Program IPSAR  
Topic VI-10.B, Section 4.23.1 - Shared  
Engineering Safety Evaluation Features"  
NRC Docket No. 50-237

References (a): M. Grotenhuis letter to L.D. Butterfield, Jr.  
dated December 22, 1987

(b): Ms. I.M. Johnson letter to T.E. Murley  
dated June 9, 1987

Dear Mr. Murley:

The above referenced topic involves the paralleling of shared 125V, and 250V DC systems. Dresden, being a two (2) unit plant, utilizes one units DC system as a second source of power for the other unit. If the DC systems are paralleled, the redundancy of the DC power systems for both units is lost.

Reference (b) consisted of a procedure Dresden had in place that allowed paralleling of the DC systems as a trouble seeking technique for ground detection. Reference (a) provided staff comments on Dresden's procedure and concluded that the procedure was not in accordance with GDC 17 of Appendix A and IEEE 308. Allowing paralleling during power operation removes the independence and redundancy of the DC systems.

Upon further review of the consequences of paralleling the DC system, Dresden agrees with the staff's position. Paralleling the 125V and 250V DC systems shall no longer be allowed during power operation of either unit. To facilitate this requirement, Dresden is revising their procedures. While the applicable procedures are being processed, temporary change requests have been enacted. The procedure change requests were implemented in July of this year.

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The Dresden Unit 2 and 3 125V DC Ground Detection Procedure change request states:

"The Units 2 and 3 batteries are not to be paralleled while attempting to locate a ground."

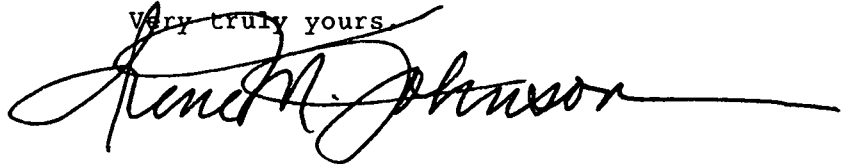
The Dresden Unit 2 and 3 250V DC Ground Detection Procedure change request states:

"The Units 2 and 3 250V DC batteries are not be paralleled while attempting to locate a ground."

Since Dresden station will only allow paralleling of the DC systems when both units are in cold shutdown, it is our belief that the concerns of the subject topic have been resolved.

Please address any questions that you may have concerning this matter to this office.

Very truly yours,

A handwritten signature in black ink, appearing to read "I. M. Johnson", with a long horizontal flourish extending to the right.

I. M. Johnson  
Nuclear Licensing Administrator

kw/lm

cc: B. Siegel - NRR, Project Manager  
Resident Inspector - Dresden  
NRC Region III Regional Administrator

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