



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690 - 0767

December 15, 1988

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

Subject: Dresden Station Units 2 and 3  
Quad Cities Station Units 1 and 2  
ATWS SER Open Items Concerning ARI and RPT  
NRC Docket Nos. 50-237/249 and 50-254/265

References (a): Letter from B.L. Siegel to H.E. Bliss  
dated November 8, 1988

(b): Letter from D.M. Grace (BWROG) to F.  
Miraglia dated December 8, 1988

Dear Dr. Murley:

The Reference (a) letter transmitted the NRC Staff Safety Evaluation Report (SER) concerning Dresden's implementation of the ATWS rule with respect to ARI and RPT. The SER found that the Dresden and Quad Cities designs for ARI and RPT are acceptable except for the degree of diversity provided between the two models of Rosemount Analog Transmitter Trip Units (ATTUs) which are used in the Reactor Protection System and the ATWS protection system. An acceptable alternative was referenced (as previously discussed in your August 8, 1988 letter to Carolina Power and Light) involving replacement ATTU circuit boards which were thought to be readily available from another vendor.

In recent discussions with General Electric Company, Commonwealth Edison has determined that these custom-made replacement boards require at least 16 weeks for delivery from the time of order and are very costly. In addition, the BWR Owner's Group (BWROG) is currently pursuing a probability based evaluation to demonstrate that the current configuration is acceptable. As indicated in Reference (b), this has recently been discussed by the BWROG Chairman with members of your staff and is a multiplant issue. Reference (b) is enclosed for your convenience.

Commonwealth Edison requests that NRR review the BWROG position (including supplemental information to be provided in early 1989) prior to requiring a commitment to replace these circuit boards.

8812200014 881215  
PDR ADOCK 05000237  
P PNU

A055  
111

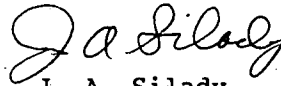
Regardless of the outcome of the Staff evaluation of the BWROG position, the 16 week procurement lead time precludes modifying the ARI and RPT systems during the current Dresden 2 outage which began two weeks prior to receipt of the Reference (a) letter and is now scheduled to end in approximately 8 weeks.

To resolve the two additional open items concerning the ARI function time and reset verification, CECO is evaluating data from post-modification test results and potential procedural enhancements, respectively.

As indicated above, CECO will supplement this response pending Staff review of the BWROG effort to address the ATTU diversity issue. At that time, CECO will also provide a discussion of the actions taken to resolve the two additional open items.

Please contact this office should further information be required.

Very truly yours,



J. A. Silady

Nuclear Licensing Administrator

lm

cc: A.B. Davis - Regional Administrator, RIII  
B.L. Siegel - Project Manager, NRR  
T.M. Ross - Project Manager, NRR  
S.G. DuPont - Resident Inspector, Dresden  
R.L. Higgins - Resident Inspector, Quad Cities