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July 21, 1989

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Nuclear Power Station Units 2 and 3
Alternative Water Sources for the Isolation Condenser
NRC Docket Nos. 50-237 and 50-249

Reference: Letter from W.D. Shafer to Cordell Reed dated June 16, 1989, transmitting NRC Inspection Report Nos. 50-237/89012 and 50-249/89011

Mr. Davis:

As requested in the reference, this letter addresses Commonwealth Edison's efforts to mitigate potentially radioactive releases during Isolation Condenser System Operation at Dresden. These efforts have included short term actions already completed as well as an in-progress evaluation of long term improvements.

As an immediate corrective action to reduce the likelihood of a similar occurrence as described in referenced NRC reports, Dresden Operating Procedures 1300-2 "Automatic Operation of the Isolation Condenser", and 1300-3 "Manual Operation of the Isolation Condenser", have been revised. The procedures were revised to instruct Operating personnel that the use of contaminated demineralized water for shell side makeup is highly undersirable and should only be used if absolutely necessary. The revisions also provide guidance for the order of preferred system usage in the event that clean demin. water is not available for use. The High Pressure Coolant Injection system in the pressure control mode is the next preferable method. Fire water as makeup to the Isolation Condenser is next, followed by the Automatic Depressurization System. Contaminated demin. water as makeup to the Isolation Condenser is listed as the least preferable method of reactor pressure control.

In addition, Dresden is evaluating the possibility of supplying the clean demin. pumps and the Isolation Condenser inlet valve with a more reliable source of power. This would allow the use of the present clean demin. system in the event of a loss of off-site power. The implementation of this modification is dependent on which long term corrective action is chosen.

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Engineering and Construction (ENC) has investigated many long term alternatives to supply additional clean demineralized make-up to the Isolation Condenser. Some of the ideas that have been considered but rejected for various reasons, based on station input, include:

1) adding a moisture separator in the vent line,
2) using the filter backwash tanks on the refueling floor,
3) adding tanks on the refuel floor, and
4) adding tanks on the turbine building roof.

Some of the ideas that are still under consideration include:

1) precharged or atmospheric tanks on the Isolation Condenser floor,
2) motor driven pumps at grade level, and
3) upgrading the present clean demin. make-up system.

The primary option being evaluated is upgrading the present clean demin. make-up system. Once a load study is complete on the turbine building busses which would be affected by the use of larger pump motors, a firm decision and implementation schedule can be specified. Should this option not prove favorable, one of the other remaining ideas can be pursued.

A meeting is scheduled with ENC on July 25, 1989, to further discuss the proposed solutions. A status report will be provided within the next two months to identify the long term improvement which is selected and its status at that time.

Please contact this office should further information be required.

Very truly yours,

J. A. Silady
Nuclear Licensing Administrator

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cc: B.L. Siegel - Project Manager, NRR
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