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October 30, 1989

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3
Response to Generic Letter 89-16
NRC Docket Nos. 50-237/249

Reference: Generic Letter 89-16, Installation of a
Hardened Wetwell Vent, dated September 1, 1989.

Dear Sir:

The referenced Generic Letter informed the licensees of Boiling Water Reactor (BWR) plants with Mark I containments of the NRC program for disposition of the issues related to the Mark I Containment Performance Improvement Program. The Generic Letter encouraged licensees to voluntarily install a hardened vent under the provision of 10 CFR 50.59, and requested that licensees provide notification of their plans for this issue. This letter provides Commonwealth Edison's (Edison's) response to that request.

SECY 89-017 indicates that the primary benefit of the hardened vent is the reduction of risk associated with the TW (loss of decay heat removal) sequence. Edison believes that actions necessary to mitigate this sequence may be accomplished by taking full advantage of the isolation condensers already installed at Dresden Station Units 2 and 3.

Edison is evaluating the use of the isolation condensers as a viable alternative to a hardened vent for the mitigation of a TW sequence. The BWR Owners' Group (BWROG) is currently developing generic design criteria for a hardened vent. It is anticipated that these criteria will be available by April 30, 1990, for NRC review. Edison is participating in the BWROG's efforts in order to provide the rationale for use of the isolation condensers at Dresden Station. This rationale will be provided to the NRC by Edison 60 days following issuance of the BWROG's generic design criteria.

Edison will be performing an Individual Plant Examination (IPE) for Dresden Station to fulfill the requirements of Generic Letter 88-20, with an expected completion date of April 1992. Upon completion of this IPE, a review of its results may identify additional considerations specific to Dresden Station with respect to the TW sequence issue.

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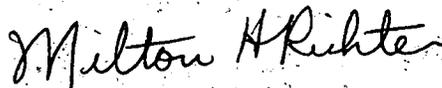
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Edison has completed a conceptual cost estimate for a hardened vent similar in design to that depicted in the Generic Letter. The cost for this type of vent design at Dresden Station Units 2 and 3 is estimated at approximately \$2 million. Providing AC power independence could increase this cost estimate by an additional \$1 million.

Edison believes that utilization of the presently installed isolation condensers at Dresden Station significantly contributes to closing the NRC's Mark I Containment Performance Improvement Program.

Please direct any questions that you may have concerning this response to this office.

Respectfully,



M.H. Richter
Generic Issues Administrator

cc: A.B. Davis - Regional Administrator, Region III
Resident Inspector - Dresden