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October 6, 1989

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

Subject: Dresden Station Units 2 and 3
Radwaste Tank Rooms
NRC Docket Nos. 50-237 and 50-249

Mr. Davis:

Enclosed are discussions of two areas questioned by your staff during a meeting on the condition of the Dresden Radwaste Tank Rooms which was held on September 20, 1989 at Region III.

Attachment A contains a summary of the FSAR/UFSAR review which was performed following the meeting as a result of questions concerning the application of 10 CFR 50.59 to previous and planned changes in the Radwaste System. Attachment B describes the ground water level for the site, as requested during the meeting.

Finally, with respect to our plans for cleaning the tank room floors in 1990, Mr. L.R. Greger requested a more specific schedule. The Radwaste Sludge Tank Room and Spent Resin Tank Room floors are scheduled to be cleaned by June 30, 1990.

Please contact this office should further information be required.

Very truly yours,

J.A. Silady
Nuclear Licensing Administrator

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Attachments (2)

cc: B.L. Siegel - Project Manager, NRR
S.G. DuPont - Senior Resident Inspector, Dresden
L.R. Greger - EPRP Branch Chief, Region III

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ATTACHMENT A

RADIWASTE FSAR AND 10 CFR 50.59 REVIEW

Reviews of the Dresden FSAR Radwaste System Process sections were performed. The result of these reviews indicate that the descriptions contained in the FSAR reflect current Radwaste system installations. However, in the early 1970's (approximately 1972), the centrifuge dewatering of filter sludges and spent resins was abandoned because of excessive maintenance requirements on the centrifuge and inconsistencies in moisture content of the final dewatered material. The centrifuge processing equipment is still installed but processing of filter sludge and spent resins is now being accomplished by a settling and decanting method that utilizes the originally installed tanks. Commonwealth Edison Company believes that the change in the original tank function does not alter the validity of the original FSAR descriptions. The Updated FSAR notes that the installed centrifuge is no longer operational. Also, the change in processing methodology occurred before the promulgation of 10 CFR 50.59 safety evaluation requirements (March 1974).

A question was raised at the NRC Region III meeting regarding the core boring of the Radwaste Building basement ceiling. This core boring was performed in June, 1987 under special work requests D63774, D63775, and D63776. These holes are used to facilitate cleaning of the radwaste tanks significantly reducing radiation exposure to personnel. Because the core borings provide access for cleaning only and do not impact Radwaste System operation, they were not considered modifications and did not fall under the 10 CFR 50.59 Safety Evaluation criteria. However, prior to boring the holes, an evaluation was performed by Sargent and Lundy to determine acceptable hole location and to confirm there would be no impact of the borings on the structural integrity of the ceiling. Finally, the holes were covered with plates (when not in use) to maintain the barrier of the Radwaste Building basement.

At present, Dresden Station is in the process of upgrading the Radwaste System. When completed, the appropriate changes will be incorporated into the Updated FSAR. As indicated at the September 20, 1989 meeting, all of the ongoing upgrade modifications have received the required 10 CFR 50.59 safety evaluations.

Dresden Station's present program requires safety evaluations to be performed under the provisions of 10 CFR 50.59 for all functional changes to systems or components in the Radwaste System. Modifications to the Radwaste Systems receive the same level of review as other plant systems. Dresden Administrative Procedure DAP 5-1, "Plant Modification Program", requires a 10 CFR 50.59 Safety Evaluation for all Radwaste System modifications. Dresden Administrative Procedure, DAP 10-2, "Title 10 of the Code of Federal Regulations Part 50.59 Review Screening and Safety Evaluation", provides the basis, guidelines, and screening methodology for performing safety evaluations per 10 CFR 50.59.

ATTACHMENT B

SITE GROUND WATER

The ground water level between site coordinates 14,500E to 15,500E and 7,000N to 8,000N was determined to vary between elevation 505 feet and 507 feet. These elevations were determined from a review of borings (Figures F-8 through F-12 - Log of Typical Borings) that are included in Design Specification K-2100, "Specification for Construction of Unit 2 Addition to Dresden Nuclear Power Station for the Commonwealth Edison Company." These borings were taken in 1955 and 1956.

Additionally, the Dresden Nuclear Power Station Unit 2 Plant Design and Analysis Report was reviewed for information regarding the site water level. Two exploration test borings were drilled at the site in March, 1965 to depths of approximately 100 feet below the existing surface. These borings were reviewed to determine the water level at the site. The water level indicated in Boring 1 was approximately 509 feet and in Boring 2 was approximately 512 feet.

These water levels are well above the 488 foot elevation of the Radwaste Tank Rooms and therefore provide the hydrostatic pressure which can cause minor in-leakage into these and other basement areas of the plant.