



**Commonwealth Edison**  
72 West Adams Street, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690 - 0767

November 29, 1989

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

Subject: Dresden Nuclear Power Station Units 2 and 3  
Response to Generic Letter 89-21.  
Implementation Status of USI Requirement  
NRC Docket Nos. 50-237 and 50-249

Reference: Letter from JG Partlow to  
Licensees dated October 19, 1989  
(received October 30, 1989)

Dear Dr. Murley:

Enclosed is the information requested by the subject Generic Letter (which was transmitted by the referenced letter) concerning the implementation status of Unresolved Safety Issue (USI) requirements relevant to Dresden Units 2 and 3.

The status for each relevant USI has been determined to the best of our ability in the allotted 30 day period since receipt of the referenced letter. Commonwealth Edison believes the enclosed information accurately reflects the Dresden USI implementation status at this time. However, should additional information become available which differs from that enclosed, the revisions will be promptly communicated to the NRR Project Manager for Dresden.

Please contact his office further information be required.

Very truly yours,

*John A. Silady*

John A. Silady  
Nuclear Licensing Administrator

0418T  
Attachments

cc: A.B. Davis - Regional Administrator  
B.L. Siegel - Project Manager, NRR  
S.G. DuPont - Senior Resident Inspector, Dresden

A012

11

8912060061 891129  
PDR ADDCK 05000237  
F PIC

UNRESOLVED SAFETY ISSUES FOR WHICH A FINAL TECHNICAL RESOLUTION HAS BEEN ACHIEVED  
DRESDEN UNITS 2 AND 3

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>STATUS/DATE</u>	<u>REMARKS</u>
A-1	Water Hammer	C 5/85	High reactor water level feed pump trip was installed in the early 1970's. The training upgrade requirements of NUREG 0737, Item I.A.2.3 were incorporated into the training program prior to accreditation. Dresden was accredited in May 1985.
A-2/ MPA D-10	Asymmetric Blowdown Loads on Reactor Primary Coolant Systems	N/A	
A-3	Westinghouse Steam Generator Tube Integrity	N/A	
A-4	CE Steam Generator Tube Integrity	N/A	
A-5	B&W Steam Generator Tube Integrity	N/A	

C - COMPLETE  
NC - NO CHANGES NECESSARY  
NA - NOT APPLICABLE  
I - INCOMPLETE  
E - EVALUATING ACTIONS REQUIRED

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>STATUS/DATE</u>	<u>REMARKS</u>
<u>E</u> A-6	Mark I Containment Short-Term Program	C	Superceded by USI A-7
A-7/ D-01	Mark I Long-Term Program	I 3/90	NRC Letter Zwolinski to Farrar dated 9/18/85 completed the staff review of the issue. Implementation was reviewed by the NRC Inspection Report 237/87019; 249/87018 - No deficiencies were noted. The majority of the modifications for long-term program were completed between 9/77 and 8/84. Two remaining partial mods M12-2(3)-86-41C and M12-2(3)-88-03C and D deal with small bore piping and are scheduled for D3R11.
A-8	Mark II Containment Pool Dynamic Loads	N/A	
A-9	Anticipated Transients Without Scram	C 2/87	Modifications for ARI, RPT, and SLCS were completed 2/87. SER issued on 11/8/88. Tech Spec change for SLCS and RPT was submitted 9/29/89. Per 9/29/89 submittal no Tech. Spec. change for ARI is required.
A-10/ MPA B-25	BWR Feedwater Nozzle Cracking	C 11/83	Modifications were completed U-2, 5/81 and U-3, 5/82. SER issued 11/1/83.

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>STATUS/DATE</u>	<u>REMARKS</u>
A-11	Reactor Vessel Material Toughness	I 6/90	Tech. Spec. ammendment to incorporate radiation effects into PT curves were submitted per R.G. 1.99. Based upon the relatively low end-of-life fluence and the small expected drop in end-of-life charpy upper shelf energy from RG 1.99, General Electric and CECo believe that there are no technical concerns with older BWR vessels dropping below the 50 ft.-lbm limit. However, CECo plans to approach the BWROG to establish a generic program to develop baseline data for initial unirradiated charpy upper shelf values for older BWR vessels and provide the associated documentation. Based upon recent discussions with GE, CECo expects a report to be issued in approximately 6 months.
A-12	Fracture Toughness of Steam Generator and Reactor Coolant Pump Supports	N/A	
A-17	Systems Interactions	C 10/89	Event reviews are conducted in accordance with NUREG 0737 Item I.C.5 and are controlled by DAP's 2-11 and 2-12. CECo's response to GL 88-20 committed to an IPE program. Water intrusion and flooding from internal sources are part of the IPE.

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>STATUS/DATE</u>	<u>REMARKS</u>
A-24/ MPA B-60	Qualification of Class 1E Safety-Related Equipment	C 8/86	SER issued 2/12/86. SER granted an extension for U-3. Mods completed for U-2 4/85 and U-3 8/86. Followup inspections 237/86013; 249/86015 and 237/89010; 249/89009. During the 1989 inspection, the inspector had a concern with EQ electrical enclosures that contain taped splices or terminal blocks that may not have weep holes. Consequently, Dresden is currently performing walkdowns of all EQ circuits enclosures to address this concern.
A-26/ MPA B-04	Reactor Vessel Pressure Transient Protection	N/A	
A-31	Residual Heat Removal Shutdown Requirements	N/A	
A-36/ C-10, C-15	Control of Heavy Loads Near Spent Fuel Phase I Phase II	C 7/83  C 6/85	TER issued 7/11/83 found phase I acceptable. Superseded by Phase II.  Draft TER issued 6/84. As documented in GL 85-11, Dresden 2 and 3 were part of NRC pilot review program of Phase II. GL 85-11 concluded that based on the results of the Phase II pilot program there are not residual concerns of sufficient significance to demand further generic action.
A-39	Determination of SRV Pool Dynamic Loads and Pressure Transients	N/A	See A-7

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>STATUS/DATE</u>	<u>REMARKS</u>
A-40	Seismic Design Criteria	I	Waiting final NRR acceptance of EPRI - Seismicity Owner's Group position on Items 1, 2, and 3 of the proposed SRP. Item 4 dealing with the design of flexible vertical tanks will be addressed as part of USI A-46.
A-42/ MPA B-05	Pipe Cracks in Boiling Water Reactors	I 12/90	Leakage monitoring Tech. Spec. revision is in Off-site Review. Expected approval date, 11/30/89, and project submittal to NRC in early 1990. Tech. Spec. requirements for ISI program will be removed from the Tech. Specs. and included in the ISI program following NRR review of GL 88-01 response and SER issuance. Revised ISI program is expected to be submitted to NRR for approval by the end of 1990.
A-43	Containment Emergency Sump Performance	N/A	
A-44	Station Blackout	I	The 4/17/89 CECO response proposed the coping approach in combination with some hardware changes. During a working meeting held on 10/4/89, there appears to be a difference of opinion between the staff and CECO regarding plant acceptable blackout duration capability. Discussions are on-going.
A-45	Shutdown Decay Heat Removal Requirements	C	USI A-45 will be addressed by IPE as implemented by GL 88-20. Dresden IPE is expected to be completed by 4/92.

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>STATUS/DATE</u>	<u>REMARKS</u>
A-46	Seismic Qualification of Equipment in Operating Plants	I 6/91*	Waiting staff approval of SQUG generic inspection plan and issuance of the final SER. SQUG walkdowns will be conducted following staff approval of GIP. Based upon an early 1990 approval, the walkdowns have been tentatively scheduled for completion in mid 1991.
A-47	Safety Implication of Control Systems	E	Response to GL 89-19 is due 3/90. May require a Tech. Spec. revision.
A-48	Hydrogen Control Measures and Effects of Hydrogen Burns on Safety Equipment	I	Waiting for NRR to issue the staff position. Discussions are ongoing.
A-49	Pressurized Thermal Shock	N/A	

\*Tentative schedule based on projected NRR approval of the GIP.