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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
 Supplemental Response to Generic Letter 89-21
NRC Docket Nos. 50-237 and 50-249

- References:
- (a) NRC letter from J. G. Partlow to Licensees dated 10/19/89, "Request for Information Concerning Status of Implementation of Unresolved Safety Issue (USI) Requirements," (Generic Letter 89-21)
 - (b) CECO letter from J. A. Silady to T. E. Murley dated 10/29/89, "Dresden Nuclear Power Station Units 2 and 3 Response to Generic Letter 89-21 Implementation Status of USI Requirements," NRC Docket Nos. 50-237 and 50-249.
 - (c) CECO letter from B. Rybak to H. R. Denton dated 04/15/83, "Quad Cities Station Units 1 and 2 Resolution of NUREG-0612, Control of Heavy Loads at Nuclear Power Plants," NRC Docket Nos. 50-254 and 50-265.
 - (d) CECO letter from B. Rybak to H. R. Denton dated 05/19/83, "Dresden Station Units 2 and 3 Resolution of NUREG-0612, Control of Heavy Loads at Nuclear Power Plants," NRC Docket Nos. 50-237 and 50-249.

Dr. Murley:

Reference (a) requested a report on the status of implementation of Unresolved Safety Issues (USI) which are applicable to the facility and for which final resolution has been achieved. Reference (b) provided the CECO response for Dresden Units 2 and 3. As a result of the NRR Project Manager's review of Reference (b), additional information was requested for USI A-7, "Mark I Containment Long-Term Program," and USI A-36, "Control of Heavy Loads Near Spent Fuel." Attachments A and B contain the requested information for USI A-7 and USI A-36, respectively.

Very truly yours,

J. A. Silady
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Nuclear Licensing Administrator

- cc: B.L. Siegel - Project Manager, NRR
 A.B. Davis - Regional Administrator, RIII
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ATTACHMENT A

Status of USI A-7

Reference (b) indicated the status of USI A-7 as incomplete. This status, however, was based upon the progress of Dresden Station's Piping Configuration and Verification Program (PCVP) which was not directly a part of the Mark I long term program. The PCVP was initiated later by CECo in April, 1987 to address discrepancies between as-built piping and the analysis documentation. All lines analyzed by NUTECH (typically ECCS torus-attached piping systems) during the Mark I Long Term Program were included. Early in the PCVP, an operability analysis was performed to justify continued operation while the discrepancies were systematically analyzed relative to the FSAR. In some cases, pipe support repairs or piping branch connections to reinforcements were issued to reconcile discrepancies which could not be economically resolved by analysis. All Unit 3 large bore repairs and small bore modifications are installed. The current plan for Unit 2 (both large and small bore) is to complete non-outage work on a timely basis prior to the start of D2R12 in September, 1990. Outage work will be completed during D2R12. Tables 1 and 2 outline the remaining work.

TABLE 1

UNIT 2 LARGE BORE SUPPORTS

NON-OUTAGE RELATED WORK

<u>Drawing</u>	<u>Work Involved</u>	<u>Work Request</u>
M-3202-35/B Sheets 1 & 2	U-Bolt guide, Add Kicker, etc.	D-70912
M-3208-16/A Sheet 1	Remove Rod Hanger/Frame	D-70911
M-3210-06/D Sheets 1 & 2	Remove U-Bolt Guide	D-77814
M-3214-18/C Sheets 1 & 2	Guide, Add Kicker	D-76582
M-3203-11/B Sheet 1	Remove Stanchion	D-89143

OUTAGE RELATED WORK

<u>Drawing</u>	<u>Work Involved</u>	<u>Work Request</u>
M-3210-04A/E Sheets 1 & 2	Remove Guide	D-77813
M-3210-04/E Sheets 1 & 2	Install Guide	D-77813
M-3214-03D Sheets 1 & 2	Remove/Install Strut	D-78131
M-3204-05/D Sheets 1 & 2 M-3204-05/A Sheet 3	Stanchion w/Uplift Remove/Install Anchor Bolts, Add Stiffeners	D-89144
M-3204-10/E Sheets 1-3	U-Bolt Guide, Remove/Install Baseplate & Anchor Bolts	D-89142

TABLE 2

UNIT 2 SMALL BORE SUPPORTS (M12-2-88-44)

NON-OUTAGE RELATED WORK

<u>Line No./Seg. No.</u>	<u>System</u>	<u>Support Change</u>	<u>Hanger No.</u>
2-1542B-2"	Large Bore Run Line 2-1502-24"	Install new u-bolt support Remove exiting support	M-3429-H1 M-3429A-H4
2-1542A-2" D2.051	Large Bore Run Line 2-1507-24"	Install new u-bolt support Weld upgrade	M-3430-H2 M-3430-H3
2-1527-3"-LX D2.074	Large Bore Run Line 2-1522-16-LX	Replace rod hanger with strut	M-3346

OUTAGE RELATED WORK

<u>Line No./Seg. No.</u>	<u>System</u>	<u>Support Change</u>	<u>Hanger No.</u>
3/4" Vent Line D2.030	Large Bore Run Line 2-1401-16"	Weld upgrade; bolt torque verification Weld upgrade; bolt torque verification	M-3428-H1 M-3428-H2
2-1542A-2" D2.051	Large Bore Run Line 2-1507-24"	Install new u-bolt support Remove existing support	M-3430-H1 M-3430A-H1
2-1542B-2" D2.043	Large Bore Run Line 2-1502-24"	Install new u-bolt support Remove existing support Weld upgrade; bolt torque verification	M-3429-H2 M-3429A-H2 M-3429-H3

ATTACHMENT B

Status of USI A-36

Reference (b) indicated the status of USI A-36 as complete as of June 1985. This date was based upon the conclusion contained in Generic Letter 85-11 which documented Dresden Units' 2 and 3 inclusion in the NRC's Phase II pilot review program and completed Phase II of USI A-36. The NRR project manager requested additional information regarding procedure revisions. Reference (c) contains Commonwealth Edison's Quad Cities Station response for final resolution of USI A-36 Open Items. Reference (d) committed Dresden Station to resolve the remaining open items in the same manner as Quad Cities Station. Part of this commitment involved developing an administrative procedure to describe the job responsibilities of the person directing heavy loads and revising existing maintenance and fuel handling procedures to reflect the new administrative procedure.

Dresden Administrative Procedure (DAP) 4-4, "Load Handling Procedure for Heavy Loads," was developed and issued on January 30, 1985. This procedure requires that an individual will be designated as the person-in-charge of directing the movement of heavy loads. Dresden Maintenance Procedure (DMP) 5800-3, "Safe Rigging Practices," was revised to reflect DAP 4-4. Because all rigging activities at Dresden are controlled by DMP 5800-3 and maintenance and fuel handling personnel are trained to DMP 5800-3, the station considers the intent of the commitment in Reference (c) to have been satisfied. However, during the review of this commitment, it was identified that not all of the associated heavy load maintenance and fuel handling procedures had been revised to reflect DAP 4-4. Procedure inquiries (change requests) have therefore been written to have the appropriate maintenance and fuel handling procedures revised to reflect DAP 4-4. This will assure that the appropriate changes are incorporated into the next revision of the remaining procedures. An additional level of consistency with the Quad Cities commitment will then be achieved.