Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 30, 1990

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

Subject: Dresden Nuclear Power Station Unit 2
Draft Full Term Operating License

Reference: NRC letter from J. W. Craig letter to T. J. Kovach dated April 3, 1990.

Dr. Murley:

The referenced letter requested Commonwealth Edison (CECo) to: (1) review the draft Full Term Operating License to assure it accurately reflects the license conditions currently applicable for Dresden; and (2) verify that license conditions 3.E, 3.J, 3.K and 3.L are no longer required.

Dresden's review of the draft Full Term Operating License concluded that it accurately reflects the license conditions currently applicable.

The actions required by the four license conditions have been completed and CECo concurs that the conditions are no longer required. The approximate date and mechanism by which these license conditions have been satisfied are provided in the Attachment.

Please contact this office should further information be required.

Very truly yours,

J.A. Silady
Nuclear Licensing Administrator

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

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ATTACHMENT

IMPLEMENTATION OF UNIT 2 LICENSE CONDITIONS E, J, AND K

CONDITION 3.E:

For the purpose of repairing a crack in the recirculation bypass line in the "A" loop, the licensee may perform the repair program as described in a report entitled "Commonwealth Edison Company Dresden Station 2A Recirculations Pump 4" Equalizing Line Repair Program" transmitted by letter dated September 23, 1974.

ACTION:

The Unit 2 recirculation bypass line repair involved replacing a length of pipe in the "A" loop. The repair program was performed under Work Request 8482 and was completed in October 1974.

CONDITION 3.J:

Systems Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

ACTION:

The Dresden Leakage Reduction Program is described and administered by Dresden Administrative Procedure (DAP) 14-2, Leakage Reduction Program, which includes the elements specified in the License Condition. Revision 0 of this procedure was approved on December 28, 1979. This program continues to be implemented under Revision 1 of DAP 14-2.

CONDITION 3.K:

Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel;

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

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ACTION:

A method for obtaining radioiodine samples during post accident conditions was implemented on July 1, 1980 as verified by Inspection Report 237/81017. EPIP 300-10 has been superseded by a rewrite of the EPIPs and replacement of outdated counting equipment. The Post Accident Radionuclide Portable Spectroscopy System (PARAPS) is available for counting iodine in the event the normal gamma ray spectroscopy system is unavailable. Operating procedures are in place and Chemistry Technicians are trained on the use of this equipment. Provisions for maintenance of the equipment are included in the appropriate Dresden Instrument Surveillance (DIS) procedures.

CONDITION 3.L:

The licensee shall, by January 4, 1981, install a recirculation pump trip, or in the alternative, place and maintain the facility in a cold shutdown or refueling mode of operation.

ACTION:

A recirculation pump trip to mitigate an ATWS event was installed as modification M12-2-79-23. It was installed during the Unit 2 1981 Refueling Outage which was in progress on January 4, 1981.