



Commonwealth Edison
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Downers Grove, Illinois 60515

June 8, 1990

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

Attn: Document Control Desk

Subject: Dresden Station Units 2 and 3
Supplemental Response to
NRC Bulletin 80-11 (Masonry Walls)
NRC Docket Nos. 50-237 and 50-249

- References:
- (a) I.E. Bulletin 80-11, dated May 8, 1980.
 - (b) J. Wojnarowski (CECo) letter to H. Denton (NRC), dated October 6, 1986.
 - (c) J. Zwolinski (NRC) letter to D. Farrar (CECo), dated December 4, 1986.
 - (d) B. Siegel (NRC) letter to T. Kovach (CECo), dated July 20, 1989.
 - (e) M. Richter (CECo) letter to T. Murley (NRC), dated March 5, 1990.

Dr. Murley:

Reference (a) requested licensees to perform a re-evaluation of the design adequacy of safety-related masonry walls under postulated loads. In Reference (b), Commonwealth Edison Company (CECo) submitted documentation supporting the use of the leak-before-break concept for establishing the acceptability of the masonry walls associated with the Reactor Water Cleanup System (RWCS) for Dresden Station Units 2 and 3. With Reference (c), the NRC staff issued a safety evaluation for Dresden Station Units 2 and 3. However, the safety evaluation indicated that the concept of leak-before-break was under review as a broad-scope rulemaking issue, and that the adequacy of its application to the RWCS piping would be addressed at a later date. The NRC staff informed CECo, in Reference (d), that the leak-before-break approach was not considered acceptable for the RWCS piping at Dresden Station since the piping material was subject to an active degradation mechanism (intergranular stress corrosion cracking). Additionally, the NRC requested CECo to submit proposed actions which would resolve the staff's concerns with the design of the masonry walls associated with the RWCS for Dresden Station.

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June 8, 1990

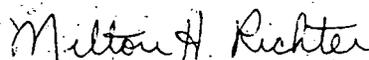
As indicated in Reference (e), an evaluation was performed to demonstrate that the safety-related masonry walls in the vicinity of high energy RWCS piping could either withstand the pressurization transient resulting from a RWCS pipe break; or that wall failure would not affect the ability to mitigate the consequences of the pipe break event or the ability to safely shutdown the plant. The evaluation determined that only one masonry wall, Wall 38 in Unit 3 (see Attachment A), would require additional actions to resolve concerns associated with a RWCS pipe break. It was determined that Wall 38, which supports the electrical pull box and cabling associated with the Unit 3 RWCS outboard containment isolation valve (MO-3-1201-2), could not withstand the calculated peak pipe break pressure. If the wall should fail, the safety-related power and control cables associated with the RWCS outboard containment isolation valve could be impacted. In the event of an RWCS pipe break, either the outboard or inboard containment isolation valve (MO-3-1201-1) would be used to isolate the break.

CECO has evaluated the modification options for Wall 38, as described in Reference (e), and has determined that the preferred design solution is to relocate the electrical pull box and cabling associated with the outboard isolation valve. This equipment relocation will ensure that wall failure, should it occur, would not affect the operation of the valve. It is expected that this work will be performed during the next refueling outage for Unit 3, presently scheduled for Spring 1991. CECO will notify the NRC if there are any changes to this schedule.

In the interim, CECO believes the risk assessment presented in Reference (e), which utilized the Systematic Evaluation Program (SEP) methodology for Dresden Unit 2, provides reasonable assurance of safety for the current plant configuration.

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

Respectfully,

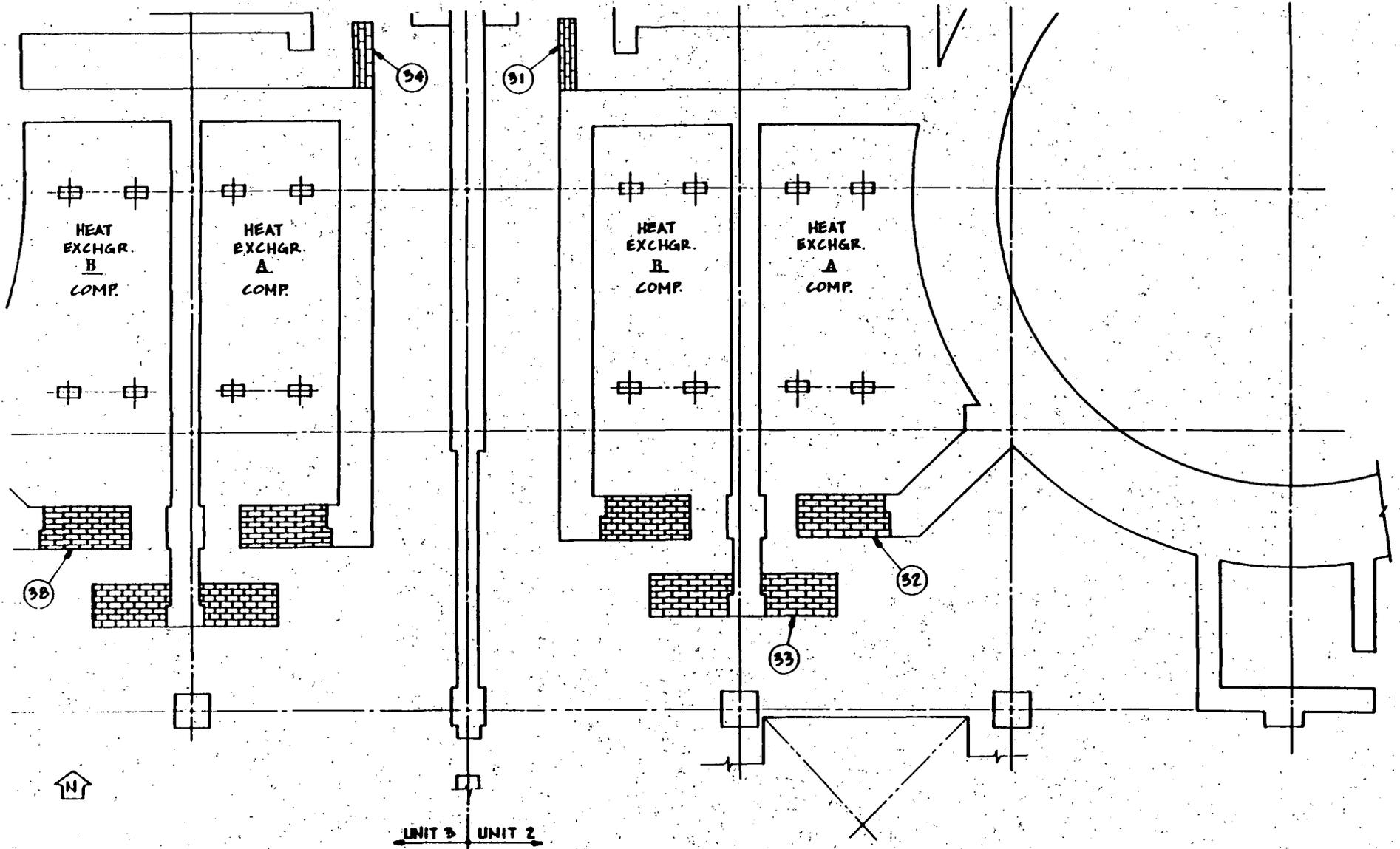


M. H. Richter
Generic Issues Administrator

Attachment: A - Dresden Station RWCS Heat
Exchanger Room Configuration

cc: A.B. Davis - Regional Administrator, Region III
Senior Resident Inspector - Dresden Station
P. Eng - NRR Project Manager, Dresden Station

ATTACHMENT A



SAFETY-RELATED MASONRY WALLS: 31, 32, 33, 34 & 38.

COMMONWEALTH EDISON COMPANY
DRESDEN UNITS 2 & 3
REACTOR WATER CLEAN-UP SYSTEM