



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

July 16, 1990

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

Attn: Document Control Desk

Subject: Dresden Station Units 2 and 3
Response to Generic Letter 89-16
Staff's Backfit Analysis Regarding
Installation of a Hardened Wetwell Vent
NRC Docket Nos. 50-237 and 50-249

- References:
- a) Generic Letter 89-16, Installation of a Hardened Wetwell Vent, dated September 1, 1989
 - b) M. Richter (CECo) letter to U.S. NRC, Response to Generic Letter 89-16 for Dresden Station Units 2 and 3, dated October 30, 1989
 - c) M. Richter (CECo) letter to U.S. NRC, Rationale for Utilization of Isolation Condensers in Lieu of Hardened Vents at Dresden Station Units 2 and 3, dated May 24, 1990
 - d) T.E. Murley (NRC) letter to T.J. Kovach (CECo), Staff's Backfit Analysis For Dresden Nuclear Power Station Units 2 and 3 Regarding the Installation of a Hardened Wetwell Vent (Generic Letter 89-16), dated June 15, 1990

Dear Sir:

Generic Letter 89-16 (Generic Letter) informed licensees of the NRC's intent to disposition issues related to the Mark I Containment Performance Improvement Program. The Generic Letter encouraged Mark I licensees to voluntarily install a hardened vent under the provision of 10 CFR 50.59 to address risks associated with the TW (loss of decay heat removal) sequence. We committed to install a hardened vent for our Quad-Cities Station, which does not employ an Isolation Condenser. Commonwealth Edison Company's (CECo) initial response for Dresden Station, Reference (b), indicated that Units 2

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and 3 feature Isolation Condensers capable of mitigating the TW sequence. A cost estimate for a hardened wetwell vent for Dresden Units 2 and 3 was provided as requested in the Generic Letter. Additionally, CECO committed to provide the rationale for the use of the Isolation Condensers in lieu of hardened vents once the design criteria under discussion between the BWR Owners Group and the NRC were finalized. Reference (c) provided that rationale, which is based on the following:

- 1) The capability of the existing Isolation Condenser system to meet or exceed the BWR Owners' Group (BWROG) design criteria for a TW sequence decay heat removal device.
- 2) The Dresden Units 2 and 3 plant design containing a number of features which make the units inherently less vulnerable to TW sequence events.

Although the letter of Reference (d) does not discuss our proposal for mitigating the effects of the TW sequence utilizing the Isolation Condenser System, we believe this to be a viable alternative to a hardened vent backfit. We have been in communications with the utility management from other Isolation Condenser Mark I containment plants and, based on those conversations, believe that a meeting to outline the concerns we have with the application of a hardened vent to those plants would be in order.

Discussions with F. Miraglia of your staff have been initiated to propose that the Isolation Condenser plant utility management conduct a joint meeting with you to discuss our concerns. Mr. Steve Floyd of the BWR Owners Group has advised me that such a meeting has been scheduled for July 24, 1990. The BWR Owners Group is coordinating this meeting and its agenda.

CECO's response to the request for hardened vent installation at Dresden Station in Reference (d) will depend upon the outcome of this meeting. We believe that such a meeting can be productive and allow us to show that Isolation Condensers successfully preclude the need for hardened vents. Therefore, we are requesting an extension in the 30 day response requirement in your June 15 letter, Reference (d), pending the outcome of our proposed discussion.

You or your staff should direct any questions that may arise concerning this matter directly to me at 708-515-7575.

Respectfully,

D. Galle 7/16/90
D. P. Galle
Vice-President
Nuclear Operations

cc: A. Bert Davis - Regional Administrator, RIII
Senior Resident Inspector - Dresden
B. Siegel - NRR Project Manager

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