



Commonwealth Edison
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 Downers Grove, Illinois 60515

July 20, 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 Nuclear Station Units 2 and 3
 Generic Letter 83-28; Item 4.5.3
NRC Docket Nos. 50-237 and 50-249

References: (a) Generic Letter 83-28; D.G. Eisenhower
 letter to All OLs and CPs dated
 July 8, 1983.

(b) Letter from G.L. Alexander to H.R. Denton
 dated August 23, 1985.

Dr. Murley:

Item 4.5.3 of Generic Letter 83-28 requested that Commonwealth Edison provide confirmation that the on-line functional testing of the reactor trip system was being performed to ensure that the availability of Reactor Protection System (RPS) remains high. In January, 1985 the BWR Owner's Group submitted a generic response (NEDC 30844) to item 4.5.3.

In reference (b), Commonwealth Edison stated that NEDC 30844 is applicable to Dresden and Quad Cities. Subsequently, the NRC requested that a more definitive endorsement of the document be provided. Attached is our endorsement of the study.

If there are any questions or comments to this response, please direct them to R. Stols at 708/515-7283.

Very truly yours

R. Stols
 Nuclear Licensing Administrator

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Attachment

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

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ATTACHMENT

Item 4.5.3 of Generic Letter 83-28 requested that licensees review the existing on-line functional testing intervals required by the Technical Specifications. Licensees were required to ensure that the current and proposed intervals for RPS functional testing are consistent with the goal of achieving high RPS availability considering uncertainties in component and common mode failure rates and, reduced redundancy and operator errors during testing. In January, 1985, the BWR Owner's Group submitted NEDC 30844 entitled "BWR Owner's Group Response to Generic Letter 83-28, Item 4.5.3". The generic report addressed the availability of RPS, the uncertainties, reduced redundancy during test or repair, operator errors and component wear out.

Subsequently, NEDC 30851P, which used the base case results from NEDC 30844 to establish a basis for extending the current RPS on-line test intervals and allowed out of service times, was issued in May, 1985. NEDC 30851P also provided additional analyses of various known different RPS configurations to support the application of the generic bases on a plant specific basis. NEDC 30844 and NEDC 30851P utilized reliability analyses with fault tree modeling to estimate RPS failure frequency.

In order to apply these generic reports to any particular plant, each utility was to perform a verification report with plant specific interpretations of the generic analysis. This evaluation is reported in MDE-73-0485 and MDE-74-0485 (GE proprietary documents) for Dresden Units 2 and 3, respectively. The results of the evaluation indicated that the RPS configuration for Dresden Units 2 and 3 has several differences when compared to the RPS configuration in the generic evaluation; however, the analysis reported in NEDC 30851P showed that these differences would not significantly affect the improvement in plant safety due to the changes in the technical specifications based on the generic analyses. Changes in the RPS system which have occurred since the development of the site specific analysis have also been evaluated. The evaluation concluded that these changes have a negligible effect on the RPS availability as described in the generic and site specific evaluations.

Commonwealth Edison thereby endorses the two NEDC generic evaluations and the Dresden specific evaluations described above.