



Commonwealth Edison
 1400 Opus Place
 Downers Grove, Illinois 60515

August 9, 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
 Response to Generic Letter 90-04
NRC Docket Nos. 50-237 and 50-249

- References: (a) Generic Letter 90-04 from J. Partlow (NRC),
 dated April 25, 1990.
 (b) T. Kovach (CECo) letter to T. Murley (NRC),
 dated June 28, 1990.

Dr. Murley:

Generic Letter 90-04 (Generic Letter) was issued as a part of the NRC's continuing effort to establish and maintain an accurate and validated implementation status for all significant Staff-imposed regulatory requirements or corrective actions. The Generic Letter requested that the current implementation status of all generic safety issues (GSI) identified in Enclosure 1 (of the Generic Letter) be provided to the Staff by June 29, 1990. Reference (b) requested that the submittal date be extended to July 31, 1990.

The Attachment to this letter provides the status for the GSIs identified in the Generic Letter for Dresden Station Units 2 and 3. Commonwealth Edison has provided the information in accordance with the guidance established in the Generic Letter. The status of the GSIs was informally transmitted to the Staff prior to the submittal of this response. Additional time was necessary to compile the detailed information requested by the Staff on each GSI.

Please direct any questions regarding this response to this office.

Respectfully,

Milton H. Richter

M.H. Richter
 Nuclear Licensing Administrator

Attachment

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

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FACILITY NAME: Dresden Station
DOCKET NO.: 50-237 (Unit 2) and 50-249 (Unit 3)
LICENSEE: Commonwealth Edison Company

ATTACHMENT

STATUS OF LICENSEE IMPLEMENTATION OF GENERIC SAFETY ISSUES
RESOLVED WITH IMPOSITION OF REQUIREMENTS OR CORRECTIVE ACTIONS

<u>GSII/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS</u>
40 (B065)	Safety Concerns Associated With Pipe Breaks in The BWR Scram System	All BWRs	U-2 C U-3 C	Letters dated 1/25/82 and 2/23/82 from T. Rausch to D. Eisenhut provided the plant specific response to NUREG 0803. No further action is required. NRC's generic SER was transmitted by Generic Letter 86-01.
41 (B058)	BWR Scram Discharge Volume Systems	All BWRs	U-2 C U-3 C	Modifications were implemented on the SDV and instrument volumes for Units 2 and 3. The Unit 2 modification (M-12-2-81-011) was completed on 9/10/85, and the Unit 3 modification (M-12-3-81-011) was completed on 10/21/83. Technical Specification amendments (Unit 2 Amendment 84 and Unit 3 Amendment 59) were submitted to reflect new instrument volume instrumentation (installed by modifications).
43 (B107)	Reliability Of Air Systems	All Plants	U-2 I U-3 I	CECo will issue a letter by August 15, 1990 which will provide a status on Generic Letter 88-14.
51 (L913)	Improving the Reliability of Open-Cycle Service Water Systems	All Plants	U-2 I U-3 I	M. Richter letter to U.S. NRC, dated 1/29, provides the schedule for those actions being implemented to address Generic Letter 89-10. Current schedule is consistent with that requested by the Generic Letter. CECo will provide a response following the D2R12 (September 1990) and D3R12 (March 1991) refueling outages as requested by the Generic Letter.

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<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS</u>
67.3.3 (A017)	Improved Accident Monitoring	All Plants	U-2 I U-3 I	<p>Letter dated 9/1/88 from D. Muller to H. Bliss accepted CECo response to Regulatory Guide 1.97 with the exception of the neutron flux monitoring instrumentation. Three items which have not been completed are:</p> <ul style="list-style-type: none"> - Wide Range Neutron Monitoring System - This item is currently being discussed by NRR and BWROG. Reference letter from T. Kovach to T. Murley dated June 26, 1990. - Separation of Safety and Non-Safety Related Equipment - Isolators will be installed in both units. The Unit 2 modification (M12-2-89-014) is currently scheduled to be performed during D2R12 (September 1990), and the Unit 3 modification (M12-3-89-014) is currently scheduled to be performed during D3R12 (March 1991). - Diesel Generator Cooling Water Flow Indication - Modifications will be performed for each Emergency Diesel Generator (EDG). The modification for EDG 2/3 (M12-2/3-87-021) is currently scheduled to be performed during D2R12 (September 1990). The modification for EDG 2 (M12-2-87-054) is currently scheduled to be performed during D2R12 (September 1990). The modification for EDG 3 (M12-3-87-054) is currently scheduled to be performed during D3R12 (March 1991).
75 (B076)	Item 1.1 - Post-Trip Review (Program Description and Procedure)	All Plants	U-2 C U-3 C	<p>CECo responded in letters dated 11/5/83 (P. Barnes letter to H. Denton) and 6/5/85 (G. Alexander letter to H. Denton). Dresden Station has implemented a post-trip review procedure. NRC accepted CECo's responses in a letter dated 7/25/85 from J. Zwolinski to D. Farrar.</p>

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS</u>
75 (B085)	Item 1.2 - Post-Trip Review - Data and Information Capability	All Plants	U-2 C U-3 C	CECo responded in letters dated 11/5/83 (P. Barnes letter to H. Denton) and 4/29/86 (G. Alexander letter to H. Denton). New station process computers, which were installed in late 1983 timeframe, provide enhanced post-trip review capabilities. NRC accepted CECo's responses in a letter dated 6/6/86 from J. Zwolinski to D. Farrar.
75 (B077)	Item 2.1 - Equipment Classification and Vendor Interface (Reactor Trip System Components)	All Plants	U-2 C U-3 C	CECo responded in letters dated 11/5/83 (P. Barnes letter to H. Denton) and 7/26/85 (G. Alexander letter to H. Denton). Station procedure which provides the control of vendor information was presented in 7/26/85 letter. NRC accepted CECo's responses for Item 2.1 (Part 1) in a letter dated 11/9/87 from M. Grotenhuis to L. Butterfield. NRC accepted CECo's responses for Item 2.1 (Part 2) in a letter dated 11/23/88 from B. Siegel to H. Bliss.
75 (B086)	Item 2.2.1 - Equipment Classification for Safety-Related Components	All Plants	U-2 C U-3 C	CECo responded in letters dated 11/5/83, 2/29/84, 4/3/89, 10/4/89 and 10/27/89. No further action required. NRC accepted CECo's responses in a letter dated 11/28/89 from B. Siegel to T. Kovach.
75 (L003)	Item 2.2.2 - Vendor Interface for Safety-Related Components	All Plants	U-2 I/E U-3 I/E	Clarification of NRC staff position is provided in Generic Letter 90-03. CECo response will be submitted by 9/26/90.
75 (B078)	Items 3.1.1 & 3.1.2 - Post-Maintenance Testing (Reactor Trip System Components)	All Plants	U-2 C U-3 C	CECo response dated 11/5/83 (P. Barnes letter to H. Denton) indicated no further action required. NRC accepted the response in a letter dated 5/16/85 from J. Zwolinski to D. Farrar.
75 (B079)	Item 3.1.3 - Post-Maintenance Testing - Changes to Test Requirements (Reactor Trip System Components)	All Plants	U-2 C U-3 C	CECo response dated 11/5/83 (P. Barnes letter to H. Denton) indicated no further action required. NRC accepted the response in a letter dated 9/25/85 from J. Zwolinski to D. Farrar.

<u>GSJ/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS</u>
75 (B087)	Items 3.2.1 & 3.2.2 - Post-Maintenance Testing (All other Safety-Related Components)	All Plants	U-2 C U-3 C	CECo response dated 11/5/83 (P. Barnes letter to H. Denton) indicated no further action required. NRC accepted the response in a letter dated 5/16/85 from J. Zwolinski to D. Farrar.
75 (B088)	Items 3.2.3 - Post-Maintenance Testing - Changes to Test Requirements (All Other Safety-Related Components)	All Plants	U-2 C U-3 C	CECo response dated 11/5/83 (P. Barnes letter to H. Denton) indicated no further action required. NRC accepted the response in a letter dated 9/25/85 from J. Zwolinski to D. Farrar.
75 (B080)	Item 4.1 - Reactor Trip System Reliability (Vendor-Related Modifications)	All Plants	N/A	Generic Letter 83-28 states that this item is applicable to all PWRs.
75 (B081)	Items 4.2.1 & 4.2.2 - Reactor Trip System Reliability - Maintenance and Testing (Preventative Maintenance and Surveillance Program for Reactor Trip Breakers)	All PWRs	N/A	
75 (B082)	Item 4.3 - Reactor Trip System Reliability - Design Modifications (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	N/A	
75 (B090)	Item 4.3 - Reactor Trip System Reliability - Tech Spec Changes (Automatic Actuation of Shunt Trip Attachment for Westinghouse and B&W Plants)	All W and B&W Plants	N/A	
75 (B091)	Item 4.4 - Reactor Trip System Reliability (Improvements in Maintenance and Test Procedures for B&W Plants)	All B&W Plants	N/A	

<u>GSI/(MPA No.)</u>	<u>TITLE</u>	<u>APPLICABILITY</u>	<u>STATUS</u>	<u>COMMENTS</u>
75 (B092)	Item 4.5.1 - Reactor Trip System Reliability - Diverse Trip Features (System Functional Testing)	All Plants	U-2 C U-3 C	CECo responded in letters dated 11/5/83 (P. Barnes letter to H. Denton) and 6/1/84 (P. Barnes letter to H. Denton). Test procedures were implemented for backup scram valve and RPS EPA testing. Additionally, diverse and redundant level switches (for high level trip) were added to SDV instrument volume (see modifications in GSI 41). NRC accepted CECo's responses in a letter dated 5/16/85 from J. Zwolinski to D. Farrar.
75 (B093)	Items 4.5.2 & 4.5.3 - Reactor Trip System Reliability - Test Alternatives and Intervals (System Functional Testing)	All Plants	4.5.2 U-2 C 4.5.2 U-3 C 4.5.3 U-2 I 4.5.3 U-3 I	CECo responded in letters dated 11/5/83 (P. Barnes letter to H. Denton) and 6/1/84 (P. Barnes letter to H. Denton). Procedure revision for backup scram valve testing (which is performed on a refueling outage basis) was completed in 11/84. NRC accepted CECo's responses in a letter dated 3/9/87 from R. Auluck to D. Farrar. Plant specific analysis was performed in April 1985. Endorsement of BWROG generic analysis (NEDC 30844 and NEDC 30851P) was provided in a letter from R. Stols to T. Murley dated July 20, 1990.
86 (B084)	Long Range Plan for Dealing with Stress Corrosion Cracking in BWR Piping	ALL BWRs	U-2 C U-3 C	IEB 82-03 (including Rev. 1) applied to Unit 2. Unit 2 commitments for IEB 82-03 performed during Spring 1983 refueling outage and mid-cycle inspection in 11/83. IEB 83-02 applied to Unit 3. Unit 3 commitments for IEB 83-02 performed during Fall 1983 refueling outage which concluded in March 1984. CECo provided a response to Generic Letter 84-11 in a letter dated 6/4/84 from B. Rybak to H. Denton. Generic Letter 84-11 inspections began with the Fall 1984 refueling outage for Unit 2 and Fall 1985 refueling outage for Unit 3. Inspections in accordance with Generic Letter 84-11 guidance continued until that guidance was superseded by Generic Letter 88-01.

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93 (B098)	Steam Binding of Auxiliary Feedwater Pumps	All PWRs	N/A	
99 (L817)	RCS/RHR Suction Line Valve Interlock on PWRs	All PWRs	N/A	
124	Auxiliary Feedwater System Reliability	ANO-1&2, Rancho Seco, Prairie Island 1&2, Crystal River-3, Ft. Calhoun	N/A	
A-13 (B017)	Snubber Operability Assurance - Hydraulic Snubbers	All Plants	U-2 C U-3 C	Hydraulic snubbers are no longer installed in safety-related applications.
A-13 (B022)	Snubber Operability Assurance - Mechanical Snubbers	All Plants	U-2 C U-3 C	Unit 2 Technical Specification Amendment 70 incorporated mechanical snubbers in Section 3/4.6.I. Unit 3 Technical Specification Amendment 62 incorporated mechanical snubbers in Section 3/4.6.I.
A-16 (D012)	Steam Effects on BWR Core Spray Distribution	Oyster Creek & NMP-1	N/A	
A-35 (B023)	Adequacy of Offsite Power Systems	All Plants	U-2 C U-3 C	Modification M12-2-80-34 installed degraded voltage relays, completed 6/22/83. Unit 2 Technical Specification Amendment 72 incorporated degraded voltage relays in Tables 3.2.2 and 4.2.1. Modification M12-3-80-34 installed degraded voltage relays, completed 3/9/84. Unit 3 Technical Specification Amendment 64 incorporated degraded voltage relays in Tables 3.2.2 and 4.2.1.
B-10	Behavior of BWR Mark III Containments	All BWR Mark III Plants	N/A	Dresden is a Mark I Plant.
B-36	Develop Design, Testing and Maintenance Criteria for Atmosphere Cleanup System Air Filtration and Adsorption Units for Engineered Safety Features Systems and for Normal Ventilation Systems	All Plants with OL Applications After 4/1/80	N/A	Licenses received prior to 4/1/80.

GSI/(MPA No.)

TITLE

APPLICABILITY

STATUS

COMMENTS

B-63 (B045)

Isolation of Low Pressure
Systems Connected to the
Reactor Coolant System
Pressure Boundary

All Plants

U-2 NC
U-3 NC

CECo response dated 3/14/80 (W. Naughton, letter to D. Eisenhut) indicated the configurations of concern did not exist and no further action was required. CECOs response dated 6/11/87 (M. Turbak letter to U.S. NRC) submitted a listing of PIVs as requested by Generic Letter 87-06.

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