



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

January 23, 1992

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3  
Response to the Unresolved Item in NRC  
Inspection Report Nos. 50-237/91032; 50-249/91035  
NRC Docket Nos. 50-237 and 50-249

Reference: H.J. Miller letter to Cordell Reed dated  
November 27, 1991, transmitting NRC  
Inspection Report Nos. 50-237/91032; 50-249/91035

Dear Sirs:

Enclosed is Commonwealth Edison Company's (CECo) response to the subject Unresolved Item that was transmitted with the referenced letter and Inspection Report. The Unresolved Item regarded a disagreement between Dresden Station's Technical Specifications and the requirements of 10 CFR 50, Appendix J.

If there are any questions or comments concerning this response, please contact Peter Piet, Nuclear Licensing Administrator, at (708) 515-7282.

Sincerely,

T.J. Kovach  
Nuclear Licensing Manager

Attachment

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

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## **RESPONSE TO UNRESOLVED ITEM**

### **INSPECTION REPORT NOS. 50-237/91032; 50-249/91035**

NRC Inspectors identified that Dresden Station had changed their airlock test methodology based on a 1982 NRR Safety Evaluation Report (SER). This SER stated that Dresden's previous method of testing the airlocks (before 1982) did not meet the requirements of 10 CFR 50, Appendix J. Dresden subsequently revised the airlock test to be consistent with 10CFR50, Appendix J. However, Dresden's Technical Specifications were not updated accordingly.

At the time of the inspection, NRC Inspectors noted that Dresden's Technical Specifications specified airlock testing at 10 psig with an acceptance criteria of 0.0375La. 10 CFR 50, Appendix J requires that the specified airlocks are tested at Pa, 48 psig for Dresden with an acceptance criteria of 0.05La. Dresden procedurally controls airlock testing to be performed per the requirements of 10 CFR 50, Appendix J.

In early 1991, Dresden Station prepared a Technical Specification amendment request to correct the discrepancy with 10 CFR 50, Appendix J requirements. However, this amendment was not submitted pending reevaluation of the requirements outlined within Dresden's proposed package.

In late 1991, a meeting was held between the cognizant individuals at Dresden Station and CEC's Nuclear Licensing Department to outline a plan for resolving the difference between Dresden's Technical Specifications and 10 CFR 50, Appendix J concerning airlock testing. As a result, a new On-Site Review modifying the Technical Specifications to be consistent with the requirements of 10 CFR 50, Appendix J for airlock testing will be prepared. Dresden's proposed amendment package will use the Standard Technical Specifications for a BWR/4 (NUREG 0123) as a guideline. Dresden expects to submit this amendment to the NRC by May 1992.