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July 16, 1976

Mr. Dennis L. Ziemann, Chief
Operating Reactors Branch 2
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Dresden Station Unit 3
Diesel Generator Flood Protection
NRC Docket No. 50-249

References (a): Dresden Station Special Report No. 33, Final Flood Protection Measures (Permanent Flood Protection of the Containment Cooling Service Water Pumps and Diesel Generator Cooling Water Pump) NRC Docket Nos. 50/237/249

(b): J. S. Abel letter to D. L. Ziemann dated August 23, 1973, NRC Docket Nos. 50-237/249

Dear Mr. Ziemann:

On Tuesday, July 13, 1976, at 0530 hours, the Unit 3 diesel generator was declared inoperable due to a failure of the cooling water pump. Investigation determined the pump was damaged beyond repair within the seven (7) day Technical Specification limit. To allow continued operation, the original diesel generator cooling water pump will be substituted for the failed pump until a suitable replacement can be installed. This submersible pump should be re-installed by August 30, 1976. The following evaluation is a temporary measure to allow continued operation of Unit 3 with a temporary diesel generator cooling water pump. The modification is necessary due to the failure of the pump and lead time necessary to obtain a previously ordered spare pump.

It is proposed that the Unit 3 cooling water submersible pump, installed as part of the flood protection modification, be replaced with a nonsubmersible type pump. The replacement pump, actually the originally installed pump, meets all the design requirements except for the submersion protection. The temporary pump will be installed on the bed plate of the old pump and fit up to the original piping. The modification work will be completed in accordance with the Quality Assurance Manual.

A 10 CFR 50.59 review was conducted and it was determined that there are no unreviewed safety questions involved in this modification. However, since Reference (a) indicates the diesel generator cooling water pumps are the submersible type, this presentation is made to justify continued operation of Unit 3 for a short period of time without the flood protection.

It is highly improbable that a simultaneous LOCA, loss of all off-site power, and a failure of the circulating water piping could occur. The plant has been previously analyzed for operation with one diesel generator inoperative and found adequate to handle a LOCA and loss of off-site power. Additionally, the Technical Specification allows operation for seven days with an inoperative diesel generator. In the event of cribhouse flooding making the diesel generator cooling water pump inoperable, to insure all margins of safety are maintained, Unit 3 will be shutdown using normal operating procedures.

Reference (b) proposed an interim fix to allow operation with the originally installed non-submersible diesel generator pumps. At that time, an emergency cooling water supply has provided from the diesel fire pump to the 2/3 diesel generator. The 2/3 diesel generator was then available for standby duty while plant shutdown was accomplished. Additionally, the concurrent loss of offsite power was addressed and found acceptable since the units can be maintained in a safe shutdown condition with the isolation condenser. The isolation condenser system makeup valve was opened upon receiving the indication of cribhouse flooding. The consequences of the currently proposed temporary operating provisions are less severe than this previous evaluation.

Since in this case the Unit 2 and Unit 2/3 diesel generators will remain operable in the event of cribhouse flooding, justification for continued operation is even more conservative. Additionally, should it be necessary, the Unit 2 diesel generator crosstie to the Unit 3 emergency busses could be utilized.

In summary, it is concluded that operation with the temporary diesel generator cooling water pump is justified for a short period of time. With the administrative shutdown of Unit 3, should the cribhouse flood, these provisions are more conservative than interim operating provisions previously reviewed and described in Reference (b).

You will be advised of any change in this schedule.

One (1) signed original and 39 copies are provided for your use.

Very truly yours,

G. A. Abrell
Nuclear Licensing Administrator
Boiling Water Reactors