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August 30, 1989

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Dresden Nuclear Power Station Unit 2  
Systematic Evaluation Program (SEP)  
Updated Status Report and Supplemental  
Response on Topic III-7.B  
NRC Docket No. 50-237

- References (a): Letter from J.A. Silady to T.E. Murley  
dated April 11, 1989
- (b): Letter from B.L. Siegel to T.J. Kovach  
dated July 26, 1989.
- (c): Conference Call between CECO (J. Silady,  
D. Skolnik), S&L (T. Ryan, K. Koesser)  
and NRR (B. Siegel, Sai Chan) on July 17,  
1989.

Dr. Murley:

Reference (a) provided a status Report on the Dresden Unit 2 Systematic Evaluation Program (SEP). Enclosure A is the latest revision to the SEP status report. The major changes included in this revision are corrections to the reference letters associated with Topic III-4.A. These changes are discussed further in Enclosure A.

Reference (b) provided a 1986 Technical Evaluation Report by the Franklin Research Center on SEP Topic III-7.B and requested CECO to provide information which had been discussed on the Reference (c) conference call. This information is provided in Enclosure B and, based on the Reference (c) discussions, should allow the Staff to close Topic III-7.B.

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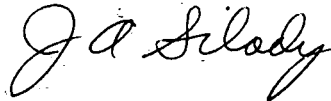
T.E. Murley

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August 30, 1989

Please contact this office should further information be required.

Very truly yours,



J. A. Silady  
Nuclear Licensing Administrator

lm

Enclosures (2)

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

0262T:3

50-237

DRESDEN

CECO

SEP STATUS RPT & SEP TOPIC III-7.B response

w/ltr dtd 8/30/89

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**-NOTICE-**

## ENCLOSURE A

The dates of the letters referenced for Topic III-4.A, Sections 4.5.3 and 4.5.4 in the previous SEP Status List (pages 3 and 4) are incorrect. This Enclosure discusses the correct references and provides an updated Status List with the corrections incorporated.

### Section 4.5.3

The erroneous references stated in the previous Status List were:

Section 4.5.3 referenced "CECo letters to US NRC dated March 16, 1983 and September 19, 1983."

The March 16, 1983 letter is actually a NRC letter to CECo requesting additional information about Topic 4.5.3.

The September 19, 1983 letter is actually an undocketed CECo draft letter to respond to the March 16, 1983 request for additional information.

The correct references for Topic III-4.A, Section 4.5.3 are:

Letter from Mr. T.J. Rausch (CECo) to Mr. Robert Gilbert (NRC) dated February 2, 1983. This letter provides responses to Staff concerns about tornado missiles.

Letter from Mr. B. Rybak (CECo) to Mr. Robert Gilbert (NRC) dated October 18, 1983. This is the docketed letter which provided responses to the March 16, 1983 NRC request for additional information.

Letter from Mr. B. Rybak (CECo) to Mr. Robert Gilbert (NRC) dated June 12, 1984. This letter provided a revised version of the "Probabilistic Analysis of Tornado Missile Hazard" report that was originally submitted with the February 3, 1983 transmittal.

### Section 4.5.4

The erroneous references stated in the previous Status List were:

Letter dated March 16, 1983 should be the letter dated February 3, 1983. See explanation above.

Letter dated September 19, 1983 should be the letter dated October 18, 1983. See explanation above.

Letter dated June 7, 1984 should be the letter dated June 12, 1984.  
See explanation above.

Statement "Additional information to describe safety-related equipment behind "C" wall by July 17, 1987 transmitted to NRC dated June 26, 1987" should read "Additional information to describe safety-related equipment behind "C" wall submitter per CECo letter dated June 26, 1987."

The foregoing corrections have been made to the SEP Status List and a revised copy is attached. We apologize for any inconvenience caused by these errors.

SEP TOPICS (34 ITEMS OF NUREG-0823)

8-89

Status Codes: C = Completed by CECO  
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| SEP TOPIC NO.<br>TITLE  | SECTION NO. | SECTION TITLE                  | ACTION  | STATUS | NRC<br>APPROVAL<br>RECEIVED |
|---|-------------|--------------------------------|---|--------|-----------------------------|
| II-3.B<br>II-3.B.1  | 4.1.1       | Design Basis Groundwater Level | None required per NUREG - 0823.   | C      | Yes                         |
| II-3.C<br>Groundwater<br>Level  | 4.1.2       | Probable Maximum Flood         | Committed to revise procedure per<br>CECo letter to NRC dated 11-17-82.<br>This was completed by Procedure. EPIP 200-11<br>Rev. 1, 7-12-84.   | C      | Yes                         |
|   | 4.1.3       | Roof Loading                   | Committed to modify roof parapets by<br>letter to NRC dated 11-17-82.<br>Mod. M12-2/3-83-2 Completed 6-1-85.<br>Reviewed and closed per Inspection<br>Report 50-237/85030 dated 11-15-85.   | C      | Yes                         |
|   | 4.1.4       | Flood Emergency Plan           | Committed to revise procedure EPIP 200-11<br>per CECO letters to NRC<br>dated 11-17-82 and 11-16-83. This was completed<br>and reviewed per Inspection Report<br>50-237/80030 dated 11-15-85.<br>The revised procedure requires that a level<br>gage be installed in the intake canal.<br>This topic remains open until this<br>modification is completed.<br>Modification requested in FEB. '89. | P      | Yes                         |
| III-1<br>Classification<br>of Structures,<br>Systems, and<br>Components | 4.2.1       | Radiography Requirements       | Response submitted per CECO letter to NRC,<br>dated 4-20-87 and 12-6-87. Resolution<br>per SER dated 6-28-88.   | C      | Yes                         |
|   | 4.2.2       | Fracture Toughness             | Initial response submitted per CECO letter to<br>NRC dated 11-22-82. Response submitted to NRC,<br>dated 4-20-87 and 11-30-88. Reviewing request<br>for additional information per NRC letter<br>dated 5-1-89.  | P      | No                          |

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|--|-------------|---|--|--------|-----------------------------|
| III-2<br>Wind and<br>Tornado<br>Loadings | 4.3.1       | RB Structure Above<br>the Operating Floor           | None Required per NUREG-0823.  | C      | Yes                         |
|  | 4.3.2       | Ventilation Stack                                   | Followup concerns answered by CECO letter<br>to NRC 11-4-83.                                     | C      | No                          |
|  | 4.3.3       | Components not enclosed<br>in qualified structures. | Response submitted per CECO letter to<br>NRC, dated 11-22-82. In staff review<br>per NUREG-0823. | C      | No                          |
|  | 4.3.4       | Roof Decks  | Response submitted per CECO letter to<br>NRC, dated 11-22-82. In staff review<br>per NUREG-0823. | C      | No                          |
|  | 4.3.5       | Load Combinations                                   | Addressed as part of Topic III-7.B,<br>per NUREG 0823.   | C      | Yes                         |

DRESDEN UNIT 2  
 SEP TOPICS (34 ITEMS) OF NUREG-0823)

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|--|-------------|---|---|--------|-----------------------------|
| III-3.C<br>Water Control<br>Structures | 4.4.1       | Flow-Regulation Station   | None required per NUREG - 0823.   | C      | Yes                         |
|  | 4.4.2       | Intake and Discharge Structures   | None required per NUREG - 0823.   | C      | Yes                         |
|  | 4.4.3       | Inspection Program  | Committed to revise procedure per<br>CECo letter to NRC dated 9-2-82.<br>Procedure checked by Site Inspector and this topic<br>closed per Inspection Report 50-237/83-32<br>dated 2-1-84.                                       | C      | Yes                         |
| III-4.A<br>Tornado<br>Missiles         | 4.5.1       | Service Water System (SWS)<br>(1) Control Room<br>Ventilation System<br>(2) Auxiliary Electric Room<br>Ventilation System | Response submitted per CECO letter to<br>NRC dated 12-6-82, which committed<br>to resolve issue as part of TMI Action<br>Plan Item III.D.3.4. This was also discussed<br>in CECO letter to NRC dated 2-3-83. Verify completion. | P      | No                          |
|  | 4.5.2       | Station Battery Systems   | None required per NUREG - 0823.   | C      | Yes                         |
|  | 4.5.3       | Diesel Generator Ventilation  | Response submitted per CECO letters to<br>NRC dated 2-3-83, 10-18-83, and 6-12-84.  | C      | No                          |



SEP TOPICS (34 ITEMS) (NUREG-0823)

8-89

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|---|-------------|-----------------------------------|--|--------|-----------------------------|
|   | 4.5.4       | Exterior Tanks                    | Response submitted per CECO letters to NRC dated 2-3-83, 10-18-83 and 6-12-84. Additional information to describe safety-related equipment behind "C" wall by submitted per CECO letter dated 6-26-87. | C      | No                          |
| III-4.B   | 4.6         | Turbine Missiles                  | Resolution complete per NRC letter to CECO, LS05-83-05-069, dated 5-31-83.   | C      | Yes                         |
| III-5.A<br>Pipe Breaks<br>Inside<br>Containment -<br>HELB | 4.7.1       | Jet Impingement on Target Pipe    | Resolution complete per NRC letter to CECO, LS05-83-10-063, dated 10-27-83.  | C      | Yes                         |
|   | 4.7.2       | Broken-Pipe Impact on Target Pipe | Resolution complete per same letter as for Sec. 4.7.1.   | C      | Yes                         |
|   | 4.7.3       | Detectability Requirements        | Resolution complete per same letter as for Sec. 4.7.1.   | C      | Yes                         |
|   | 4.7.4       | Criteria Implementation           | Resolution complete per same letter as for Sec. 4.7.1.   | C      | Yes                         |
| III-5.B   | 4.8         | Pipe Break Outside Containment    | None required per NUREG - 0823.  | C      | Yes                         |

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|---|-------------|--|--|--------|-----------------------------|
| III-6<br>Seismic Design<br>Considerations | 4.9         | Battery Racks                                      | The concern expressed in section 6.3.2.1 of the SER, P. O'Connor (NRC) to L. DelGeorge (CECo), dated June 30, 1982 recommended that the wooden battens be strengthened or replaced. The 125V and 250V Battery Racks have been replaced. The racks are seismically designed.  | C      | Yes                         |
|   | 4.9.1       | Piping Systems                                     | Resolved as part of I.E. Bulletin 79-14 effort.  | C      | Yes                         |
|   | 4.9.2       | Mechanical Equipment                               | (1) Pipe Stress resulting from MOV's:<br>Response submitted per CECO letters to NRC dated 7-7-82, 9-3-82, and 11-3-82. In staff review per NUREG - 0823.<br>(2) RPV Internal Supports<br>Engineering Information submitted by CECO letters dated 6-8-81 and 12-28-84. In staff review per NUREG - 0823.<br>(3) Recirculation Pump Supports<br>Response submitted per CECO letters dated 3-10-82 and 7-22-83. | C      | No                          |
|   | 4.9.3       | Qualification of Cable Trays                       | Resolution through Owners Group. Report submitted 1-9-84. Further investigation To be handled by SQUG.   | C      | No                          |
|   | 4.9.4       | Availability of Safety Related Equipment function. | Resolution as part of USI-A46 per NUREG - 0823.  | C      | Yes                         |

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 SEP TOPICS (34 ITEMS OF NUREG-0823)

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|--|-------------|---|--|--------|-----------------------------|
| III-7.B  | 4.10        | Design Codes, Design Criteria, Load Combinations, and Reactor Cavity Design Criteria. | Response submitted per CECO letter to NRC dated 8-2-82 and 7-12-84. Reviewing request for additional information per NRC letter dated 7-26-89. | P      | No                          |
| III-8.A  | 4.11        | Loose-part Monitoring and Core Barrel Vibration Monitoring.                           | No action required at this time per NUREG - 0823. Future action, if required, will come from NRC via implementation of RG - 1.133.             | C      | Yes                         |
| III-10.A<br>Protection for<br>Motors of<br>MOV's               | 4.12.1      | Thermal Overloads   | Response submitted per CECO letters to NRC dated 11-17-83, and 1-2-85. Resolved per NRC letter to CECO 7-9-85; LS05-85-07-015.                 | C      | Yes                         |
|  | 4.12.2      | Torque Switches   | Resolved thru plant review, Ref. NUREG - 0823.   | C      | Yes                         |
| V-5<br>Reactor Coolant<br>Pressure Boundry -<br>Leak Detection | 4.13.1      | System Sensitivity  | Resolved per letter D.M. Crutchfield (NRC) to D.L. Farrar (CECo) dated 2-13-84.  | C      | Yes                         |
|  | 4.13.2      | Seismic Qualification   | Resolved per letter from B. Rybak (CECo) to R. Gilbert (NRC), 4-14-84.   | C      | No                          |
|  | 4.13.3      | System Testability  | None required per NUREG - 0823.  | C      | Yes                         |

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|----------------------------------|-------------|--|--|--------|-----------------------------|
| V-6                              | 4.14        | Reactor Vessel Integrity                                     | None required per NUREG - 0823.  | C      | Yes                         |
| V-10.B                           | 4.15        | RHR System Reliability                                       | To be resolved as part of Appendix "R" review, per NUREG - 0823.   | C      | Yes                         |
| V-11.A                           | 4.16        | Requirements for Isolation of High and Low Pressure Systems. | None required per NUREG - 0823.  | C      | Yes                         |
| V-11.B                           | 4.17        | RHR System Interlock Requirements                            | To be resolved as part of Appendix "R" review, per NUREG - 0823.   | C      | Yes                         |
| VI-4<br>Containment<br>Isolation | 4.18.1      | Locked-Closed Valves   | Response submitted per CECO letter to NRC dated 11-16-83, 3-6-84. Verify accuracy of locked valve checklists.  | P      | No                          |
|                                  | 4.18.2      | Leakage Detection  | Resolved by Procedure and Mods M12-2(3)-83-30 stated in letter from B. Rybak (CECo) to R. Gilbert (NRC), 4-14-84. Verify accuracy of locked valve checklist. | P      | No                          |

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|------------------------|-------------|--|---|--------|-----------------------------|
|                        | 4.18.3      | Manual Isolation Valves                    | By letter dated 11-18-82 CECO committed to locking valves 4327-500, 1916-500, 4327-502, and 4609-501 and revising the locked valve checklists. Verify accuracy of locked valve checklist.   | P      | No                          |
|                        | 4.18.4      | Check Valve as Isolation Valves.           | None required per NUREG - 0823.   | C      | Yes                         |
|                        | 4.18.5      | Valve Location                             | None required per NUREG - 0823.   | C      | Yes                         |
|                        | 4.18.6      | Branch lines with Single Isolation Valves. | By letter dated 11-18-82 CECO committed to add second isolation valves downstream of LPCI valve 1501-70A,B and 1599-27A,B. Also downstream of core spray valves 1402-10A,B. These valves are to be locked and added to the locked valve checklist. Redundant valves have been installed and have been added to locked-valve checklists. Reviewed and closed per Inspection Report 50-237/85-030 dated 11-15-85. | C      | Yes                         |
| VI-6                   | 4.19        | Containment Leak Testing                   | Review covered by Appendix "J" review.  | C      | Yes                         |
| VI-7.A.4               | 4.20        | Core Spray Nozzle Effectiveness            | None required at this time. Being reviewed by NRC as part of Generic Issue A-16.  | C      | Yes                         |

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|--|-------------|---|--|--------|-----------------------------|
| VI-7.C.1<br>Electrical<br>Instrumentation<br>and Control | 4.21.1      | Breaker Adequacy  | Resolution complete per NRC letter to CECO, LS05-84-01-035, dated 1-24-84.   | C      | Yes                         |
|  | 4.21.2      | Disconnect Links  | Procedure checklist DOP 6900-E2 (Rev. 7) has been enacted 6/86. A copy was submitted to the NRC on 5-12-87. No further action required per SER dated 11-16-87.   | C      | Yes                         |
|  | 4.21.3      | Use of breakers - during power operations.  | Reviewed and closed per Inspection Report 50-237/83-32 dated 2-1-84.   | C      | Yes                         |
|  | 4.21.4      | Operation with failed battery.  | Resolution complete per Tech. Spec. AM87, 5-30-85, to DPR-19.  | C      | Yes                         |
|  | 4.21.5      | Isolation of Class 1E Sources from non Class 1E Loads.  | Response submitted 3-6-85. Received request for additional information 7-9-85. Final response submitted to NRC 5-12-87. No further action required per SER dated 11-16-87. Verify accuracy of SER by 7-1-89. | C      | Yes                         |
| VI-10.A  | 4.22        | Testing of Reactor Trip System and Engineered Safety Features, including Response - Time Testing. | None required per NUREG - 0823.  | C      | Yes                         |

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|---|-------------|---------------------------|---|--------|-----------------------------|
| VI-10.B<br>Shared Engineering<br>Safety Features          | 4.23.1      | Sharing of DC Systems     | Temporary procedures in place to disallow paralleling the DC system to search for grounds. Final response submitted to NRC 10-3-88.   | C      | No                          |
|   | 4.23.2      | Diesel Generator Bypass   | Completed per NUREG - 0823.   | C      | Yes                         |
|   | 4.23.3      | Battery Status Indication | Addressed in Topic VIII - 3.B, Sec. 4.2.8.  | C      | Yes                         |
|   | 4.23.4      | Battery Room Ventilation  | Addressed by Topic IX-5, Sec. 4.2.9.1.  | C      | Yes                         |
| VII-1.A<br>Isolation of RPS<br>from Non-Safety<br>Systems | 4.24.1      | RPS Control Systems       | Response submitted per CECo letters to NRC dated 8-3-83, 11-16-83, 3-6-84, and 1-9-87. No action required per SER dated 11-20-87.   | C      | Yes                         |
|   | 4.24.2      | Process Computer          | Response submitted per CECo letters to NRC dated 8-3-83, 11-16-83, 3-6-84, and 1-9-87. Install I.E. Isolators to inputs of each recorder. Method of isolation accepted by NRC per SER dated 11-20-87. Mod M12-2(3)-87-43 completed on Unit 2, 12-88. Response to NRC request for additional information 2-2-89. Dresden 3 modification scheduled for November 1989 (D3R11). | C      | Yes                         |

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|---|-------------|--|--|--------|-----------------------------|
| VII-1.A (con't)                                   | 4.24.3      | RPS Channel Power Supplies                         | Response submitted per CECO letters to NRC dated 8-3-83, 11-16-83, 3-6-84, 8-30-84. Mod M12-2-81-18 completed 5-23-83 and Mod M12-3-81-18 completed 12-7-83. Considered closed by Site Inspector. Reviewed and closed per Inspection Report 50-237/83-32 dated 2-1-84. | C      | Yes                         |
| VII-3<br>Systems<br>Required for<br>Safe Shutdown | 4.25.1      | Procedures for Shutdown from Outside Control Room. | Addressed as part of Appendix "R" Fire Fire Protection Review per NUREG - 0823.  | C      | Yes                         |
|   | 4.25.2      | Use of Safety Grade Systems.                       | Procedures revised and accepted per NUREG - 0823.  | C      | Yes                         |
|   | 4.25.3      | RHR Single - Failure Criteria                      | Procedures reviewed as part of SEP Topic VI-10.B. Accepted per NUREG - 0823.   | C      | Yes                         |
|   | 4.25.4      | Inservice Testability                              | Procedure DIS 1000-1 implemented 10/83. Reviewed and closed per Inspection Report 50-237/83-32 dated 2-1-84.   | C      | Yes                         |
| VIII-2<br>Onsite<br>Emergency<br>Power System     | 4.26.1      | Annunciators                                       | Resolution complete per NUREG - 0823.  | C      | Yes                         |
|   | 4.26.2      | Protective Trips                                   | Response submitted per CECO letter to NRC dated 11-16-83, 3-6-84 which committed to modifications. Mod M12-2-82-38, Mod M12-3-82-38 Mod M12-2/3-82-21. These modifications completed. Reviewed and closed per Inspection Report 50-237/83-32 dated 2-1-84.             | C      | Yes                         |



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|--------------------------------|-------------|---|--|--------|-----------------------------|
| VIII-3.A                       | 4.27        | Station Battery Capacity Test Requirements  | None required per NUREG - 0823.  | C      | Yes                         |
| VIII-3.B                       | 4.28        | DC Power System Bus Voltage Monitoring and Annunciation.  | Response submitted per CECO letters to dated 10-5-82, 11-16-83, 3-6-84 which committed to modifications. MOD M12-2(3)-83-6 and M12-2-82-3 completed. Sumittal to NRC made on 8/10/87 to describe the difference of monitoring design from that proposed in the 10-5-82 letter. Commitment made to add monitoring to 24/48 V System. Resolved per SER dated 6-27-88. Mod M12-2(3)-87-58 opened. Dresden 2 modification schedule for December 1990 (D2R12). Dresden 3 modification scheduled for March 1991 (D3R12). | P      | Yes                         |
| IX-5<br>Ventilation<br>Systems | 4.29.1      | Battery Room Ventilation  | None required per NUREG - 0823.  | C      | Yes                         |
|                                | 4.29.2      | LPCI/Core Spray and Diesel Generator Rooms.   | None required per NUREG-0823.  | C      | Yes                         |
| XV-1                           | 4.30        | Increase in Feedwater Flow  | None required per NUREG - 0823.  | C      | Yes                         |
| XV-16                          | 4.31        | Radiological Consequences of Failure of Small Lines Carrying Primary Coolant Outside Containment. | Resolved per Tech. Spec. Amendment 87 dated 5-30-85.   | C      | Yes                         |
| XV-18                          | 4.32        | Radiological Consequences of Main Steam Line Failure Outside Containment.                         | Resolved by SEP Topic XV16 Tech. Spec. Amendment 87 dated 5-30-85.   | C      | Yes                         |