



Commonwealth Edison

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September 26, 1980

Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington D.C. 20555

Subject: Dresden 1
SEP Topic V-11.A, REQUIREMENTS FOR ISOLATION OF
HIGH AND LOW PRESSURE SYSTEMS
NRC Docket Nos. 50-10

Reference a): Dennis M. Crutchfield's July 1, 1980 letter to D. L. Peoples.

Dear Mr. Crutchfield:

Commonwealth Edison while noting the two MOV's referenced in Section 3.1 are normally closed valves, concurs with the factual information in the above referenced report. However, based on the criteria presented it is believed the conclusion of the report is incorrect.

Section 2.2 of the report in part states:

"2.2 Emergency Core Cooling System. Isolation requirements for ECCS are contained in SRP 6.3. Isolation of ECCS to prevent overpressurization must meet one of the following features:

- (1) One or more check valves in series with a normally-closed motor-operated valve (MOV) which is to be opened upon receipt of a SIS when RCS pressure is less than the ECCS design pressure."

Section 3.1 states, in part:

"3.1 Core Spray System. The CS system consists of three pumps providing water to a single header via two parallel piping branches. Isolation of the two branches is provided by two MOVs in series with a check valve in each branch.

"The MOVs open upon receipt of a CS system start signal when the RCS pressure has decreased to within the CS system design pressure (determined by ΔP indicator)..."

The conclusion of section 3.1. states:

"The CS system does not meet current licensing requirements for isolation of high and low pressure systems, contained in SRP 6.3, since there are no interlocks to prevent the operator from opening the isolation valves when RCS pressure exceeds system design pressure."

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The conclusion should be that Dresden 1 complies with the current licensing criteria as contained in SRP 6.3. This conclusion is based on the criteria set forth in the evaluation and the factual description of the Core Spray System which is correct except for not noting that the two MOVs are normally closed.

Interlocks to prevent the operators from opening the CS system isolation valves from the control room or the local control station when RCS pressure exceeds CS system design pressure have not been addressed by the criteria set forth for this evaluation. Therefore, the Core Spray System should not be judged against such criteria.

Please address any questions you may have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this transmittal have been provided for your use.

Yours very truly,



Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors

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