

FEB 1 1994

Docket No. 50-010  
License No. DPR-2  
CAL No. RIII-94-001

Commonwealth Edison Company  
ATTN: Mr. Michael J. Wallace  
Vice President  
Chief Nuclear Officer  
Executive Towers West III, Suite 500  
1400 Opus Place  
Downers Grove, IL 60515

SUBJECT: CONFIRMATORY ACTION LETTER (CAL) RIII-94-001 FOR DRESDEN 1

Dear Mr. Wallace:

On January 27, 1994, the NRC was notified by Dresden that on January 25, 1994, a large amount of water was discovered in the unheated Dresden 1 containment. The water resulted from service water pipe breaks caused by freezing during recent severe cold weather. During subsequent investigations, your staff identified that the fuel pool transfer tube, which connects the fuel pool to the containment, was also susceptible to freezing and failure. A failure of certain portions of the fuel pool transfer tube inside containment could have resulted in a loss of fuel pool water to a level below the top of the approximately 640 fuel bundles stored in the fuel pool. This potential event is of significant concern to us and requires your immediate attention.

This letter confirms the telephone conversations between Gary Spedl of your staff and Cynthia Pederson and James McCormick-Barger of my staff on January 31 and February 1, 1994, concerning actions to be taken by Commonwealth Edison Company to address our Dresden 1 concerns. Specifically, we understand that Commonwealth Edison Company will perform the following actions:

1. Immediately evaluate the benefit of providing backup heaters and an alternative energy source/power supply in the vicinity of the fuel transfer tube isolation and bypass valves located inside containment to ensure that no additional freezing potential exists in that area even with the inadvertent loss of the currently installed heater or associated power supply. If the evaluation concludes that an additional heater and an alternative energy source/power supply is not warranted, provide this evaluation to NRC Region III within 48 hours of receiving this letter.
2. If you intend to remove the fuel pool gates within the next 30 days, notify NRC Region III of this action and provide written justification and an evaluation of the safety consequences for this action. In

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addition, provide within 30 days, a detailed description of the actions and safety evaluations you would perform to remove the fuel pool gates in the future.

3. Provide to NRC Region III within 48 hours of receiving this letter an initial evaluation, followed by a formal evaluation within 30 days of receiving this letter, of the consequences, including expected doses to occupational workers and members of the public and radiological contamination estimates, that might occur should portions of the fuel pool transfer tube located inside containment fail, assuming the fuel pool gates remain installed or are removed.
4. Within 30 days of receiving this letter, provide to NRC Region III an engineering evaluation of the current condition of the fuel pool transfer tube and valves, taking into consideration that during the coldest part of the recent severe cold weather, portions of the fuel pool transfer tube may have experienced some freezing. Include surveillance plans for monitoring the fuel pool transfer tube and valves for potential leakage as long as fuel is in the transfer system. Additionally, include in this report the results of any other inspections such as non-destructive examinations (NDE) of the piping and valves that you have or plan to perform in the near future to assure that the system is in good condition.
5. Perform and provide to NRC Region III within 30 days an inventory of all special nuclear material (SNM) located in the fuel pool and fuel pool transfer system.
6. Should fuel movement be required within the next 60 days at Dresden Unit 1, provide to NRC Region III your plans and precautions to be taken to assure that fuel pool water inventory is not compromised. Additionally, provide to NRC Region III within 60 days of receiving this letter, your plans to address the long term safety of the fuel that is currently located in the fuel transfer system.
7. Perform a comprehensive walkdown of all piping systems and components in containment to assure that no other systems contain sources of fluids that might result in containment flooding. Provide a written report of the results of this effort to NRC Region III within 30 days of the date of this letter.
8. Conduct an investigation to determine the root causes that resulted in the heating system being isolated from the Dresden 1 containment when piping in the containment contained water. This investigation should consider how this action correlated with the provisions of your decommissioning plan and your facility license. Provide the results of this investigation to NRC Region III within 30 days of receiving this letter.

FEB 1 1994

None of the actions specified herein should be construed to take precedence over actions which you feel necessary to ensure plant and personnel safety.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

1. Notify me immediately if your understanding differs from that set forth above,
2. Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change, and
3. Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licenses; nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96-511.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and your responses will be placed in the NRC Public Document Room.

We will gladly discuss any questions you may have concerning this matter.

Sincerely,

ORIGINAL SIGNED BY W. L. AXELSON

W. L. Axelson, Director  
Division of Radiation Safety  
and Safeguards

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