



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 3, 1982

MEMORANDUM FOR: Darrell G. Eisenhut, Director
Division of Licensing

FROM: Thomas A. Ippolito, Acting Assistant Director
for Safety Assessment, DL

SUBJECT: RECOMMENDATION FOR DRESDEN 2/3 BOARD NOTIFICATION

REFERENCE: Letter from T. J. Rausche, Nuclear Licensing Administrator,
Commonwealth Edison Company to D. G. Eisenhut dated
August 26, 1982

By the referenced letter, Commonwealth Edison Company (CECo) advised the staff that they had failed to follow a procedure that they had described in testimony before the Dresden 2/3 Spent Fuel Pool Modification ASLB.

Specifically, CECo informed us that they had used the auxiliary hoist rather than the main redundant crane to install the previously approved 5 high density fuel racks in Unit 3 in 1981 and to remove empty racks from Unit 2 in 1982. Upon discovering their error CECo stopped the movement of fuel racks and provided the staff with a written commitment to review their previous testimony to assure that they were following all previous commitments and that they would use the main redundant crane for all future rack movements.

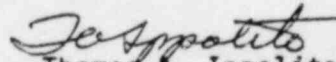
The ASLB issued its Final Initial Decision in this hearing on August 17, 1982 and the staff has issued amendments authorizing installation of 33 high density fuel racks in Dresden 2 and Dresden 3 on August 27, 1982. On August 20, 1982 an Atomic Safety and Licensing Appeal Board received the ASLB's final decision for consideration.

We recommend this issue for Board Notification. In accordance with Office Letter No. 19 the following information is provided:

- a. The ASLB and ASLAB should be notified that CECo did not carry out its rack removal and installation in a manner that had been described in testimony provided to the ASLB.
- b. The staff had relied on the redundant nature of the main overhead crane to provide additional assurance that heavy loads would not be dropped into the spent fuel pool. In using the auxiliary crane the licensee operated in a method that may have reduced the margin of safety assumed by the staff for this operation.

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- c. This issue is material but no longer relevant to the issue before the Board since the non conforming operation has ceased and all future operations will be conducted in the manner previously described to the ASLB.
- d. This information has a bearing only on Dresden 2 and Dresden 3.
- e. The information provided by the licensee will not significantly affect current staff positions related to this issue since the licensee has committed to complete its rack installation in conformance with its testimony before the ASLB.
- f. The information provided by CECO does not change the staff's safety or environmental conclusion because the licensee has committed to follow its testimony in completing the installation of the remaining racks.
- g. This information relates only to the licensee's rack installation and removal procedure. It has no impact on the staff's evaluation of the adequacy of the new racks or the analytical methods used by the licensee in the license application.


Thomas A. Ippolito
Acting Assistant Director
for Safety Assessment
Division of Licensing

Enclosure:
Ltr. CECO to D. G. Eisenhut
dtd. August 26, 1982



Commonwealth Edison
One First National Plaza Chicago, Illinois
Address Reply to Post Office Box 767
Chicago, Illinois 60690

August 26, 1982

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Proposed License Amendment
Concerning High Density Spent
Fuel Racks
NRC Docket Nos. 50-237/249

Reference (a): Cordell Reed letter to E. G.
Case dated May 11, 1978.

Dear Mr. Eisenhut:

On August 26, 1982, Commonwealth Edison made initial notification to NRC Region III, Office of Executive Legal Director, Chief Judge Wolf, the State of Illinois, and the Dresden 2 NRR back-up Project Manager that the 1981 initial installation of five (5) high density spent fuel racks into the Dresden 3 spent fuel pool was made utilizing the auxiliary overhead crane. Testimony before the ASLB concerning this proposed amendment had stated that the redundant overhead crane would be used.

To preclude the possibility of a similar occurrence during the future installation and use of the high density fuel storage racks, Commonwealth Edison is taking measures as reflected in the following proposed license condition to DPR-19 and 25:

Prior to the installation of high density fuel storage racks, the licensee shall review the testimony before the ASLB to ensure that commitments made by Commonwealth Edison regarding the installation and use of these racks will be complied with.

The redundant overhead crane will be utilized to install the high density fuel storage racks.

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

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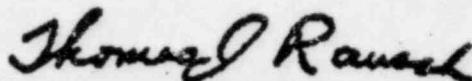
D. G. Eisenhut

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August 26, 1967

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

Very truly yours,



Thomas J. Rausch
Nuclear Licensing Administrator

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cc: Region III Inspector Dresden
and Service List

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