



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

December 13, 1982

Honorable Nunzio J. Palladino  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Dr. Palladino:

SUBJECT: ACRS REPORT ON THE SYSTEMATIC EVALUATION PROGRAM REVIEW OF THE  
DRESDEN NUCLEAR POWER STATION, UNIT 2

During its 272nd meeting, December 9-11, 1982, the ACRS reviewed the results of the Systematic Evaluation Program (SEP), Phase II, as it has been applied to the Dresden Nuclear Power Station, Unit 2. These matters were also discussed during Subcommittee meetings in Washington, D. C. on October 27 and November 30, 1982. During our review, we had the benefit of discussion with representatives of the Commonwealth Edison Company (Licensee) and the NRC Staff. We also had the benefit of the documents listed below.

The Committee has reported to you previously on reviews of the SEP evaluations of the Palisades, Ginna, and Oyster Creek plants in letters dated May 11, August 18, and November 9, 1982. The first of these reports included comments on the objectives of the SEP and the extent to which they have been achieved. Our review of the SEP in relation to the Dresden plant has led to no changes in our previous findings regarding this program, as reported in our letter on the Palisades plant.

The remainder of this letter relates specifically to the SEP review of the Dresden plant.

Of the 137 topics to be addressed in Phase II of the SEP, 30 were not applicable to the Dresden plant and 19 were deleted because they were being reviewed generically under either the Unresolved Safety Issues (USI) program or the TMI Action Plan. Of the 88 topics addressed in the Dresden review, 54 were found to meet current NRC criteria or to be acceptable on another defined basis. We have reviewed the assessments and conclusions of the NRC Staff relating to these topics and have found them appropriate.

The 34 remaining topics involved 72 issues relating to areas in which the Dresden plant did not meet current criteria. These issues were addressed by the Integrated Plant Safety Assessment, and various resolutions have been proposed.

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The Integrated Assessment has not yet been completed for 26 of the issues, for which the Licensee has agreed to provide the results of studies, analyses, and evaluations needed by the NRC Staff for its assessments and decisions. All of these issues are of such a nature that hardware backfits may be required for their resolution. The resolution of these issues will be addressed by the NRC in a supplemental report that will be available for review in connection with the application for a full term operating license (FTOL) for the Dresden plant.

For 21 of the issues included in the Integrated Assessment, the NRC Staff concluded that no backfit is required. We concur.

For the remaining issues for which the assessment has been completed, the NRC Staff requires hardware backfits in about half of the cases, and changes in procedures or Technical Specifications in the other half. The Licensee has agreed in all cases to make these changes.

As was the case for the Palisades, Ginna, and Oyster Creek plants, a plant-specific probabilistic risk assessment (PRA) was not available for the Dresden plant. In its place, the NRC Staff utilized the results of the Millstone Unit 1 PRA developed as part of the Integrated Reliability Evaluation Program (IREP), suitably modified and interpreted to reflect the differences between the two plants. The PRA study was used to address 19 of the issues included in the Integrated Assessment for the Dresden plant.

Our conclusions regarding the Dresden SEP review are similar to those for the plants previously reviewed:

1. The SEP has been carried out in such a manner that the stated objectives have been achieved for the most part for the Dresden plant and should be achieved for the remaining plants in Phase II of the Program.
2. The actions taken thus far by the NRC Staff in its SEP assessment of the Dresden plant are acceptable.
3. The ACRS will defer its review of the FTOL for the Dresden Nuclear Power Station, Unit 2 until the NRC Staff has completed its actions on the remaining SEP topics and the USI and TMI Action Plan items.

Sincerely,



P. Shewmon  
Chairman

References:

1. U.S. Nuclear Regulatory Commission Draft Report, NUREG-0823, "Integrated Plant Safety Assessment, Systematic Evaluation Program, Dresden Nuclear Power Station, Unit 2," dated October 1982.
2. U.S. Nuclear Regulatory Commission Safety Evaluation Reports, Dresden 2 Systematic Evaluation Program Topics, Volumes 1 through 3, received October 1982.
3. NRC Staff consultants' reports on the Dresden 2 Integrated Plant Safety Assessment Report consisting of consultants' reports from S. H. Bush, J. M. Hendrie, H. S. Isbin and Z. Zudans, dated November 19, November 29, November 23, and November 24, 1982, respectively.
4. Science Applications, Inc. report number SAI-002-82-BE, "Interim Reliability Evaluation Program: Analysis of the Millstone Point Unit 1 Nuclear Power Plant," Volume I, Main Report, Draft dated October 1, 1982.