



Commonwealth Edison

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September 18, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Removal and Deletion of
I.E. Bulletin 80-17 Interim
Commitments
NRC Docket No. 50-237

- References (a): I.E. Bulletin 80-17 and Supplements
1, 2, 3 and 4. J. G. Keppler letters
to Cordell Reed dated July 3, July 18,
July 22, August 22 and December 19, 1980.
- (b): V. Stello, Jr. letter to Cordell
Reed dated October 2, 1980.
(Confirmatory Orders)
- (c): D. M. Crutchfield and T. A. Ippolito
letters to J. S. Abel dated
January 9, 1981.
- (d): D. G. Eisenhut letter to All BWR
Licensees dated December 9, 1980.
- (e): R. Janecek to letter to J. G. Keppler
dated September 2, 1980.
- (f): D. M. Crutchfield letter to D. L. Farrar
dated June 24, 1983.

Dear Mr. Denton:

Reference (f) transmitted Orders requiring installation of the long-term BWR scram discharge modification for Dresden Unit 2 in conformance with the Staff's Generic SER prior to January 1, 1985 or in any case, prior to operation in Cycle 10. These modifications are being implemented during the upcoming refueling outage at Dresden Unit 2.

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Generally, the modifications include two Scram Discharge Instrument Volumes (SDIVs), improved communications between the SDV headers and the SDIVs, diverse and redundant scram sensor instrumentation, dedicated and positive vents with two air-operated isolation valves, two air-operated isolation valves on the drain lines, and diverse power supplies for the instrumentation and controls. This installation completely satisfies the requirements of the forementioned NRC Generic SER.

Because the modified Dresden Unit 2 scram discharge system will satisfy the Long Term Program Criteria of the Generic SER, and because this modified system will reliably provide to the control room operators all information concerning system operation necessary to ensure safe operation of the unit, the following equipment and actions previously required are clearly no longer applicable, and will be removed and/or deleted:

1. The SDV Continuous Monitoring System (CMS) required by I.E. Bulletin 80-17 Supplements 1 thru 4 and the Confirmatory Order, Reference (b), will be removed from Dresden Unit 2 and all associated surveillances will be deleted. All operator actions associated with the CMS (i.e. manual scram on SDV hi-hi water level alarm) will no longer be required.
2. The system which initiates control rod insertion on low pressure in the control rod drive control air header. The Orders, Reference (c), describes this automatic air header dump system as a short term provision which provides protection against water accumulation in the Scram Discharge Volume (SDV) headers in the event of degraded air conditions in BWR control air supply systems. As acknowledged in the Generic SER, improved hydraulic coupling resulting from permanent modifications such as those to be completed by Dresden Unit 2 will obviate the need for an automatic air header dump system. In fact, certain licensees identified in Table 1 of the SER were excluded from the air dump requirements because they already have adequate SDV - instrument volume hydraulic coupling.
3. Testing of the SDIV level switches after each scram event as required by I.E. Bulletin 80-17 Supplement 3 will no longer be performed. Supplement 3 specifically acknowledges that this testing is not required subsequent to the long term modifications.

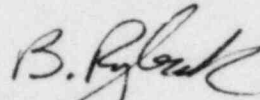
4. Purging the SDV vent after each scram event as committed in Reference (e) will no longer be performed.

We believe that I.E. Bulletin 80-17 (including supplements) and the referenced Confirmatory Orders are implicitly applicable only until modifications satisfying the Long Term Program Criteria of the Generic SER are implemented. Furthermore, we believe that these modifications at Dresden Unit 2 provide equivalent information to the operator, with a greater level of safety and reliability than the Continuous Monitoring System required by the Confirmatory Order dated October 2, 1980 and that these modifications ensure adequate hydraulic coupling to allow removal of the automatic air header dump system. Considering the above, we believe that the requirements of the October 2, 1980 and January 9, 1981, Orders, as they pertain to Dresden Unit 2, have been met with the modifications discussed above and the Orders can be considered moot upon completion of the work.

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

One signed original and forty (40) copies of this letter is provided for your use.

Very truly yours,



B. Rybak

Nuclear Licensing Administrator

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cc: R. Gilbert - NRR
NRC Resident Inspector - Dresden

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