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SVPLTR: #13-0024

June 21, 2013

U. S. Nuclear Regulatory Commission
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Dresden Nuclear Power Station, Units 2 and 3
Renewed Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Supplement to Dresden Nuclear Power Station Written Response to Preliminary White Finding from NRC Integrated Inspection Report 2013-002

Reference: Letter from D. Czufin (EGC) to U. S. NRC, "Dresden Nuclear Power Station Response to Preliminary White Finding from NRC Integrated Inspection Report 2013-002," dated June 6, 2013

In the referenced letter, Dresden Nuclear Power Station provided a written response to the NRC regarding the preliminary White finding that was identified in Inspection Report 2013-002. The response noted that a human reliability analysis was performed to assess the probability of successfully injecting into the reactor pressure vessel during a flood. The base SPAR-H assessment, used in the referenced letter, assumed that both Units 2 and 3 would be shutdown 24 hours prior to water levels reaching grade elevation.

Although reasonable, a reactor shutdown 24 hours prior to flood water reaching grade elevation is not the most conservative flood timeline. Therefore, a sensitivity study has been performed using the SPAR-H methodology assuming an even more conservative flood timeline where both Units 2 and 3 would be shutdown seven hours prior to flood waters reaching grade elevation. The flood timeline for the sensitivity study is consistent with the probable maximum flood. The sensitivity study shows that the later shutdown has a negligible impact on the time available for diagnosis and execution, and has a negligible impact on other performance shaping factors. Further, the results of this sensitivity study show that the original SPAR-H PSF multipliers and calculated HEP are not affected by the change in timing.

Even with applying a more conservative flooding assumption for reactor shutdown (i.e., 7 hours versus 24 hours) prior to water reaching grade elevation, the operator action to provide inventory make-up remains highly likely as demonstrated by the SPAR-H analysis. The sensitivity study has been provided to the Senior Reactor Analysis for review.

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RGMTII

This letter does not contain any new regulatory commitments.

Should you have any questions concerning this letter, please contact Mr. Riley Ruffin, DNPS Regulatory Assurance Manager, at (815) 416-2815.

Respectfully,

David M. Czufin
Site Vice President
Dresden Nuclear Power Station

cc: Regional Administrator, NRC Region III
NRC Senior Resident Inspector, Dresden Nuclear Power Station
Chief, Division of Reactor Projects Branch 6, NRC Region III