Mr. D. L. Farrar Manager, Nuclear Regulatory Services Commonwealth Edison Company Executive Towers West III, Suite 500 1400 OPUS Place Downers Grove, IL 60515

ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT -SUBJECT:

EXEMPTION FROM APPENDIX J TO 10 CFR PART 50 (TAC NOS. M90628,

M90629, M90630 AND M90631)

Dear Mr. Farrar:

Enclosed is a copy of the "Environmental Assessment and Finding of No Significant Impact" for a proposed exemption from Appendix J to 10 CFR Part 50. This assessment relates to your application of October 4, 1994, for a revision to an exemption dated February 6, 1992, dealing with the Dresden and Quad Cities two-ply containment penetration expansion bellows. The requested revised exemption would provide an option, if a two-ply bellows is found to leak through both plies, to do (1) a Type B test before return to power operation, or (2) a Type A test before return to power operation with the replacement of that bellows in the subsequent refuel outage, or performance of a Type B test to ensure license limits are met before return to power from the subsequent refuel outage.

This assessment has been forwarded to the Office of the Federal Register for publication.

Sincerely,

Original signed by:

Robert M. Pulsifer, Project Manager Project Directorate III-2 Division of Reactor Projects III/IV

Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249, 50-254, 50-265

Fnclosure: Environmental Assessment

cc w/encl: see next page

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*See previous concurrence

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Mr. D. L. Farrar Commonwealth Edison Company

cc:

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UNITED STATES NUCLEAR REGULATORY COMMISSION COMMONWEALTH EDISON COMPANY

DOCKET NOS. 50-237, 50-249, 50-254, AND 50-265 ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from the requirements of 10 CFR Part 50, Appendix J, to Facility Operating License Nos. DPR-19, DPR-25, DPR-29 and DPR-30, issued to Commonwealth Edison Company (ComEd, the licensee) for the Dresden Nuclear Power Station, Units 2 and 3, located in Grundy County, Illinois, and the Quad Cities Nuclear Power Station, Units 1 and 2, located in Rock Island County, Illinois.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action

The proposed action would grant an exemption from certain requirements of Appendix J to 10 CFR Part 50 in response to the licensee's request of October 4, 1994. More specifically, for each two-ply bellows that has been identified to leak through both plies, the exemption being proposed will relax the requirement to perform a Type A test every refuel outage as specified in an Exemption to the Apppendix J requirements dated February 6, 1992. The proposed revised exemption will allow the option of: 1) conducting a Type B test of the leaking bellows prior to the return to service during the present outage, or 2) conducting a Type A test to be followed up, at the next subsequent outage, with replacement of the bellows or conducting a Type B test of the leaking bellows to demonstrate license limits are met.

The Need for the Proposed Action

The proposed action is needed to relax an unnecessary requirement to perform a Type A test each refuel outage in which a two-ply bellows has been identified as leaking through both plies. The licensee has developed alternative Type B testing methods to assure a valid Type B test could be performed on these non-Type B testable bellows. The requirement to Type A test and to replace all bellows that leak through both plies could result in significant costs being incurred unnecessarily with no safety benefit in return.

Environmental Impacts of the Proposed Action

The proposed exemption revision substitutes an alternative testing and replacement program for the Type A testing requirements of the original exemption. The alternative testing program would allow, upon completion of the two-ply bellows special testing program, the following to be accomplished for those two-ply bellows that were found to leak through both plies: (1) performance of a Type B test to ensure license limits are met prior to return to service, or (2) performance of a Type A test before the return to service followed by replacement of the bellows or performance of a Type B test to ensure license limits are met before the return to service from a subsequent refuel outage. Thus, this revised exemption will not change the types, or allow an increase in the amounts, of effluents that may be released offsite and will not result in an increase in individual or cumulative occupational radiation exposure. With regard to potential non-radiological environmental impacts, the proposed revised exemption does not affect non-radiological plant effluents and has no other environmental impact. Therefore, the Commission

concludes that there are no significant radiological or non-radiological environmental impacts associated with the proposed exemption.

Alternative Use of Resources

This action does not involve the use of any resources not previously considered in the Final Environmental Statement (construction permit and operating license) for Dresden Nuclear Power Station, Units 2 and 3, dated November 1973, and for Quad Cities Nuclear Power Station, Units 1 and 2, dated September 1972.

Alternatives to the Proposed Action

Since the Commission concluded that there are no significant environmental impacts associated with the proposed exemption, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to the exemption would be to require rigid compliance with the requirements of the original Exemption requiring a Type A test every refuel outage and in the subsequent refuel outage replace bellows that had a leak, however small, on both plies. Such action would not enhance the protection of the environment and would result in unwarranted licensee expenditures of engineering and construction resources, as well as associated capital costs.

Agencies and persons Consulted

The staff consulted with the Illinois State official regarding the environmental impact of the proposed action. The State official had no comments.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the forgoing environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed exemption.

For further details with respect to this action, see the licensee's letter of October 4, 1994. This document is available for public inspection at the Commission's Public Document Room, the Gelman Building, 2120 L Street, NW., Washington, D.C., and at the local public document room located at the Morris Public Library, 604 Liberty Street, Morris, Illinois 60450, and at the Dixon Public Library, 221 Hennepin Avenue, Dixon, Illinois 61021.

Dated at Rockville, Maryland, this 5th day of December 5, 1994.

FOR THE NUCLEAR REGULATORY COMMISSION

Robert A. Capra Director

Robert A. Capra, Director Project Directorate III-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation