



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

November 5, 1976



Mr. D. L. Ziemann, Chief  
 Operating Reactors - Branch 2  
 Division of Operating Reactors  
 U. S. Nuclear Regulatory Commission  
 Washington, D.C.

Subject: Mark I Long Term Program Action Plan  
 Dresden Station Units 2 and 3 and Quad Cities  
 Station Units 1 and 2; Docket Nos. 50-237  
 50-249, 50-254, 50-265

Dear Mr. Ziemann:

During meetings with the NRC Staff on July 7, 1976 and August 19, 1976, the Mark I Owner's Group, of which Commonwealth Edison Company is a member, presented its proposal for the remaining Mark I containment evaluation program. The first task in this program was the preparation of the document entitled "Program Action Plan". At the direction of the Mark I Owner's Group, GE prepared this document and submitted 70 copies to Mr. V. Stello by L. J. Sobon's letter dated October 29, 1976. We have reviewed the Program Action Plan report submitted by GE and conclude that it accurately reflects the program that will lead to the generation of information necessary to complete the evaluation of the Dresden Unit 2/3 and Quad-Cities Units 1/2.

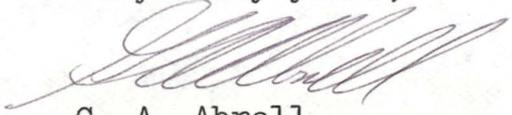
The Program Action Plan outlines the specific tasks, objectives, and activity scheduling that will lead to the generation of a Mark I Load Definition Report (LDR) and is structured so that it can be periodically updated to reflect the precise direction or emphasis of the overall program. This format allows for the identification of changes to or addition of tasks that may be required as a result of a change in the technical program emphasis such as load mitigation vs. structural modifications.

The Program Action Plan contains descriptions of the tasks outlined for the NRC Staff at the July and August meetings. It also indicates that consideration is being given to a full-scale two-dimensional steam test in response to K. R. Goller's September 19, 1976 letter to D. Galle, Chairman, Mark I Owner's Group. This consideration includes an assessment of the ability to obtain representative data from other sources, including reduced scale testing as an alternate to inclusion of a full-scale test facility. However, GE has been directed to proceed on the basis of not compromising the full-scale facility schedule even though a parallel evaluation of its need has been authorized. This is required in order to accommodate the administrative procedures that must be completed by Commonwealth Edison as well as other utility members before program task funding authorizations can be obtained and formally reflected in the task descriptions as identification of completion dates.

Commonwealth Edison, as a member of the Mark I Owner's Group, has directed GE to proceed with the activities as defined in the Program Action Plan and to perform the test facility design and/or test planning for tasks which have tentative completion dates indicated. The LDR that will be generated from this program will be utilized to complete the evaluation of the Dresden 2/3 and Quad Cities 1/2 Mark I containments. We will be actively involved during the program so that our plant unique evaluation can be completed and structural modifications, if required, can be implemented at the earliest practical opportunity. We expect to be able to document the final evaluation report within six months after the Mark I LDR is issued by the Mark I Owner's Group. Some structural modifications may be necessary after the submittal of the final evaluation report in order to meet the long term design criteria. The schedule for implementing any modifications identified will be outlined in the final evaluation report.

It should be pointed out that the Program Action Plan outlines the continuing evaluation of the Mark I containments required to assess their adequacy with respect to long term, inherently conservative, traditional design criteria. The Dresden 2/3 Quad-Cities 1/2 containments have already been evaluated in terms of agreed, but still conservative, interim design criteria. The results of this evaluation were previously submitted to the NRC. The conclusions of this interim evaluation indicate that the safe, continued operation of Dresden Units 2/3 and Quad-Cities 1/2 is justified and such operation does not present an undue risk to the public health and safety. The load under consideration for the interim evaluation are associated with the highly improbable, design basis loss-of-coolant accident. The final evaluation described in the Program Action Plan will be completed to further confirm these conclusions and to provide an assesement of structural integrity with respect to more conservative design criteria.

Very truly yours,



G. A. Abrell  
Nuclear License Administrator  
Boiling Water Reactors