



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 10, 1992

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Response to NRC Safety Evaluation Report (SER)/ Idaho National Engineering Laboratory Technical Evaluation Report (TER) of Offsite Dose Calculation Manual

Braidwood Station Units 1 and 2
NRC Docket Numbers 50-456/457

Byron Station Units 1 and 2
NRC Docket Numbers 50-454/455

LaSalle Station Units 1 and 2
NRC Docket Numbers 50-373/374

Zion Station Units 1 and 2
NRC Docket Numbers 50-295/304

Dresden Station Units 2 and 3
NRC Docket Numbers 50-237/249

Quad Cities Station Units 1 and 2
NRC Docket Numbers 50-254/265

- Reference: a) Letter from R. Barrett letter to T. Kovach dated December 2, 1991, transmitting NRC Safety Evaluation Report (SER)/ Idaho National Engineering Laboratory Technical Evaluation Report (TER) of Offsite Dose Calculation Manual (ODCM) Revision 0, March 1989.
- b) NRC Generic Letter 89-01, dated January 31, 1989

Commonwealth Edison (CECo) has reviewed the letter of Referenced a) and offers the following comments. CECo agrees with the NRC recommendations provided in the SER/TER and is preparing several ODCM revisions to be concluded by January 1993, which will incorporate the NRC SER/TER comments. We would like to provide additional clarification on the following items:

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NRC SER/TER Recommendations:

- 1) Generic Sections A.1.2.1, A.1.2.2, and A.1.4 should be corrected to show that the gamma and beta air dose limits and the non-noble gas organ dose limits for Zion Station are one-half the limits recommended in NUREG-0472 for a two-unit site, or the Technical Specifications should be amended.
- 2) To be in agreement with the recommendations of NUREG-0473, the Technical Specifications should state the limits on dose due to liquid effluents on a per-reactor instead of a site basis (this applies to Dresden Station).
- 3) To be in agreement with the recommendations of NUREG-0473, the Technical Specifications should state the limits on doses due to liquid effluents on a per-reactor instead of a site basis (this applies to Quad Cities Station).
- 4) The Technical Specifications for Zion should require monthly projections of doses due to liquid effluents.

Response:

CECo stations are in the process of transferring the Radiological Effluent Technical Specifications (RETS) from their Technical Specifications to their respective ODCM per guidance provided in Reference b. CECO plans within six months of each NRC Technical Specifications/ODCM approval, to revise the ODCM to incorporate the recommendations cited above. In the interim, administrative controls have been applied to meet the intent of recommendations 1 through 4.

Zion Station Technical Specifications Section 4.11.4, does require the monthly projection of doses due to liquid effluents.

NRC SER/TER Recommendations:

- 5) Requirements that the Containment Purge monitors provide automatic termination of release should be added to the ODCM and the Technical Specifications (this applies to Braidwood Station).
- 6) Requirements that the Containment Purge monitors provide automatic termination of release should be added to the ODCM and the Technical Specifications (this applies to Byron Station).

Response:

Concerning items 5 and 6, the Containment Purge Process monitors provide an alarm function when the effluent stream exceeds a specified level. At that time, Station personnel would follow established procedures to terminate the release by manually actuating the Containment Purge Valves. Additionally, further downstream, the Auxiliary Building Vent Stack Effluent Monitors provide a similar function.

CECo believes that the current system for Containment Purge termination is appropriate and will revise Chapter 10 of the ODCM to include an expanded explanation of these monitors.

NRC SER/TER Recommendations:

- 7) Automatic termination of release by the Steam Jet Air Ejector Off-Gas monitors should be required by the Technical Specifications, as recommended by NUREG-0473 (this applies to Quad Cities).
- 8) Automatic termination of release by the Containment Purge and Gas Decay Tank monitors should be required by the Technical Specifications, as recommended by NUREG-0472 (this applies to Zion Station).

Response:

Zion Station's Technical Specifications does address the automatic termination of the Containment Purge.

The requirement for automatic termination for items 7 and 8, will be included in a revised version of the ODCM, Chapter 10 in lieu of placement into the Technical Specifications.

If you have any questions or comments concerning this, please direct them to John Golden at (312) 294-4315.

Sincerely,


Denise Saccomando
Nuclear Licensing

cc: A.B. Davis, Regional Administrator - RIII
R. Barrett, Project Directorate III
A. Hsia - NRR