



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

October 9, 1992

Dr. Thomas Murley, Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Document Control Desk

Subject: Generic Letter 92-01, revision 1 "Reactor Vessel Structural Integrity", dated March 6, 1992.

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: GL 92-01 Submittal Letter from CECo, M. A. Jackson to the
USNRC, Dr. Thomas Murley dated July 1, 1992.

Dr. Murley,

A teleconference between the Nuclear Regulatory Commission (NRC) and Commonwealth Edison (CECo) was held on October 6, 1992. The teleconference was held to discuss CECo's submittal to Generic Letter (GL) 92-01. At the conclusion of the teleconference, CECo committed to providing the NRC with the following. An amendment to the submittal, action plans to provide test reports of wall location capsules not referenced in the submittal, indication of whether any capsules have been withdrawn after July 26, 1983, and to determine what actions were taken as a result of the 1983 law that required compliance with Appendix H. The purpose of this letter is to provide the amendment to the referenced submittal. The other aforementioned actions will be documented in a report which will be submitted by November 30, 1992. This letter confirms that an exemption from 10 CFR Part 50, Appendix H is no longer required.

The purpose of the teleconference was to discuss CECo's response to question 1 of the Generic Letter. This question requested licensees to provide information regarding their surveillance programs. Specifically, if licensees did not have a surveillance program meeting ASTM E 185-73, -79, or -82 and did not have an approved NRC integrated surveillance program, then the licensee was to provide actions taken to be in compliance with Appendix H. Those actions included revising the surveillance program to meet Appendix H or indicating a plan to request an exemption from Appendix H to 10 CFR Part 50 under 10 CFR 50.60 (b).

The material surveillance programs for Dresden and Quad Cities were designed prior to any of the three standards cited in question 1 of the Generic Letter. But, according

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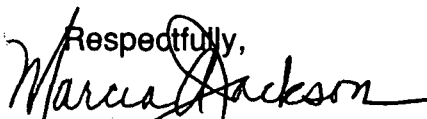
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to Appendix H that part of the surveillance program conducted prior to the first capsule withdrawal must meet the requirements of the edition of the ASTM E 185 that is current on the issue date of the ASME code to which the reactor vessel was purchased. The edition of ASTM E 185 applicable to the Dresden and Quad Cities surveillance programs is ASTM E 185-62. General Electric also used ASTM E 185-66 as a guide. While reviewing the Dresden and Quad Cities surveillance programs it was thought that we did not meet all of the requirements of E 185-62 but were in substantial compliance with E 185-66. Since CECO believed, at the time, that we did not meet all of the requirements of ASTM E 185-62 and in accordance with the Generic Letter, it was necessary to provide a schedule for an exemption request from Appendix H. The referenced response stated that CECO would be providing the NRC with a description of the Dresden and Quad Cities surveillance programs, where the programs differ from E 185- 62 and -66 and how we currently meet the objectives of Appendix H.

CECO has now determined that a request for an exemption from Appendix H is not warranted. CECO has determined Dresden and Quad Cities Stations must comply with ASTM E 185-62 and no further reference will be made to ASTM E 185-66. ASTM E 185-62 does not specify which vessel materials must be included in the surveillance program, only that "a portion of the material used in the fabrication of the component" be used. From a review recently performed by GE, we have established that the Dresden and Quad Cities surveillance programs include plate material known to be from the beltline, which meets the E 185-62 requirements. The Dresden and Quad Cities programs also include a representative electroslag and submerged arc welds which can be viewed as extra materials included to improve the technical adequacy of the program. Based on a thorough review of E185-62 and comparison with our surveillance programs at Dresden and Quad Cities, an exemption from Appendix H is no longer required.

Please direct any questions that you may have to this office.

Respectfully,



Marcia A. Jackson
Nuclear Licensing Administrator
Generic Issues

cc: A. Bert Davis, Regional Administrator, RIII
R. Barrett, Project Director, NRR
B. Siegel, PM NRR
L. Olshan, PM NRR
W. Rogers, Dresden SRI
T. Thomas, Quad Cities SRI