



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 4, 1993

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Updated Final Safety Analysis Report (UFSAR)
Revision Submittal Frequency for
Commonwealth Edison Company Nuclear Stations

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

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

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

Dresden Station Units 2 and 3
NRC Docket Nos. 50-327/249
237

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

LaSalle County Station Units 1 and 2
NRC Docket Nos. 50-373/374

Dear Dr. Murley:

10 CFR 50.71 Rule Change

On January 28, 1992, President Bush signed a memorandum entitled "Reducing the Burden of Government Regulation" and sent it to all Federal agencies. Prompted by this memorandum, the NRC's Committee to Review Generic Requirements (CRGR) recommended revising regulations in eight areas.

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Subsequently, the requirement to provide revisions to the UFSAR on an annual basis, pursuant to 10 CFR 50.71 "Maintenance of records, making of reports", was revised effective October 1, 1992. 10 CFR 50.71(e)(4) currently states:

"Subsequent revisions must be filed annually or 6 months after each refueling outage provided the interval between successive updates to the FSAR does not exceed 24 months. The revisions must reflect all changes up to a maximum of 6 months prior to the date of filing."

Discussion

Although the above referenced rule change is clearly worded, questions regarding its applicability to two-unit sites have been raised. This issue is of particular interest to Commonwealth Edison Company (CECo) as all of CECo's Stations are two-unit sites. The "Summary and Analysis of Public Comments" section of the applicable Federal Register notice acknowledges that interpretation of this rule, as it applies to two-unit sites, will be necessary. The response to Comment 11 in Federal Register / Volume 57 / No. 169 / Monday, August 31, 1992 / page 39355, states:

"With respect to the petitioner's concern about multiple facilities sharing a common FSAR, licensees will have maximum flexibility for scheduling updates on a case-by-case basis. This final rule does not address multiple facilities."

It is clear that if two-unit sites applied this rule on a "per unit" basis, the regulatory burden would increase rather than decrease, contrary to the intent of the rule change.

UFSAR Revision Submittal Proposal

Based on the above discussion, CECo respectfully requests the Staff's concurrence with the proposed UFSAR revision submittal policy as stated below.

Byron and Braidwood

Byron and Braidwood share a common FSAR. CECo proposes to submit a single revision to the Byron/Braidwood UFSAR not to exceed a 24 month interval. Specifically, each revision to the UFSAR will be submitted to the NRC no later than 24 calendar months from the date of the previous UFSAR revision submittal. The revision will reflect the changes for all Byron and Braidwood units up to a maximum of 6 months prior to the date of filing. This policy will establish a "floating" 24 month UFSAR revision due date based on the previous Byron/Braidwood UFSAR submittal date. As the new rule was effective on October 1, 1992, Byron and Braidwood will next submit a UFSAR revision no later than 24 months from the date of the last submittal.

Zion, Dresden, Quad Cities and LaSalle

Each Station maintains its own UFSAR that is common to both units at that particular site. Consistent with the policy stated above, CECO proposes to submit a single revision to each Station's UFSAR not to exceed a 24 month interval. Specifically, a revision to the UFSAR will be submitted to the NRC no later than 24 calendar months from the date of the previous UFSAR revision submittal for each individual Station. The revision will reflect all changes for both units of the applicable Station up to a maximum of 6 months prior to the date of filing. This policy will establish a "floating" 24 month UFSAR revision due date, for each Station, based on the previous UFSAR submittal date for that respective Station. As the new rule was effective on October 1, 1992, each Station will next submit a UFSAR revision no later than 24 months from the date of the last submittal.

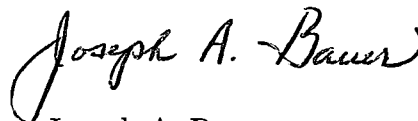
Conclusion

Commonwealth Edison Company believes the proposed UFSAR revision policy is consistent with the intent of the 10 CFR 50.71 rule change, which is to reduce regulatory burden without reducing the protection of the public health and safety and the common defense and security.

CECO respectfully requests that the Nuclear Regulatory Commission review this proposed policy and provide a written response addressing its implementation by July 1, 1993.

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

Respectfully,



Joseph A. Bauer
Nuclear Licensing Administrator

cc: J.B. Hickman, Byron Project Manager - NRR
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