



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

October 4, 1994

Mr. William T. Russell
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Request to Revise Exemption from 10CFR50
Appendix J Type B Testing Requirement for
Two-Ply Containment Penetration Bellows
NRC Docket Nos. 50-237/249 and 50-254/265

- References: (a) J. L. Schrage to T. E. Murley letter dated November 12, 1991.
(b) B. A. Boger to T. J. Kovach letter dated February 6, 1992 (copy attached as Enclosure A).

Dear Mr Russell:

This letter transmits Commonwealth Edison Company's (ComEd's) request to revise an approved Exemption from 10 CFR 50 Appendix J Type B Testing requirements for two-ply containment penetration bellows at Dresden Station and Quad Cities Station. This was originally submitted to the NRC in Reference (a), and approved by the NRC Staff in Reference (b) (copy attached as Enclosure A). In that exemption, in lieu of an acceptable Type B test, ComEd originally agreed to perform a special testing program to demonstrate that the affected bellows assemblies were adequately tested during each refuel outage. The exemption also called for performance of an Integrated Leak Rate Test (ILRT) in accordance with 10CFR 50, Appendix J, Type A requirements each refuel outage. The initiating circumstances, and a complete description of the special testing program are described in the original exemption, which is provided in Enclosure A.

ComEd now believes that the requirement to perform a Type A test every outage is not necessary to ensure that the bellows assemblies are adequately tested and leakage from any leaking bellows assembly is adequately quantified. This position has been developed based upon the following insights gained during testing of two-ply bellows at Dresden Station and Quad Cities Station during recent refuel outages (D2R13, D3R12, D3R13, Q1R12, Q1R13, Q2R11, and Q2R12):

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- There is minimal probability for the occurrence of a large leak in a two-ply bellows;
- The special testing program is effective for identifying small leaks in two-ply bellows;
- The Type A test is ineffective for identifying small leaks in two-ply bellows; and
- More cost effective alternative methods have been developed for quantifying leakage.

ComEd believes that maintaining the requirement to perform a Type A test each refuel outage will result in significant costs being incurred unnecessarily with no commensurate safety benefit. Based upon this information, ComEd believes that this proposed revision to the exemption is safety neutral and will, at the same time, result in a significant cost savings. The associated savings meet the Cost Beneficial Licensing Action (CBLA) Task Force's monetary threshold of \$100,000. Therefore, ComEd requests that this exemption be prioritized as a **CBLA**. The review and approval of this exemption is critical to the planning and execution of the thirteenth refuel outage at Quad Cities Station Unit 2 (Q2R13). Therefore, this proposed revision to the exemption should take priority over other non-outage related licensing actions for Quad Cities Station.

The proposed revision to the exemption consists of a modification of the requirement to perform a Type A test every refuel outage. ComEd has developed a set of alternative approaches (including, but not limited to, continued reliance on the Type A test) which can be applied to ensure the intent of the Type A test in the original exemption is met. Details of the proposed alternatives are described in Enclosure B. This proposed revision to the previously approved exemption will ensure that the leakage from leaking two-ply bellows is detected and adequately quantified, either individually or in aggregate.

The requested revision to the previously-approved exemption from Appendix J requirements is appropriate under the current circumstances based upon the criteria established in 10 CFR 50.12.a.2(iii). This regulation requires the presence of special circumstances in order for the Commission to consider granting an exemption. The regulation states that special circumstances are present whenever compliance would result in undue hardship or costs which are significantly in excess of those contemplated when the regulation was adopted, or significantly in excess of those incurred by others in similar situations.

Given the testing adequacy of two-ply containment penetration bellows at Dresden Station and Quad Cities Station, ComEd believes that this proposed revision of a previously approved exemption is safety neutral. Therefore, ComEd believes that the costs associated with performance of a Type A test every refuel outage are significantly in excess of those contemplated when the regulation was adopted, and significantly in excess of those incurred by other licensees in similar situations. The basis and supporting justification for the proposed revision to the original exemption request (including cost comparison information for the Type A test and proposed alternative methods) are provided in Enclosure B.

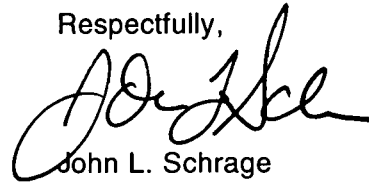
As part of the Reference (a) exemption request, ComEd also stated that the total cost for compliance with 10 CFR 50 Appendix J (replacement of the two-ply bellows) was \$33.35 million. This estimated cost has changed since the exemption was approved. The revised total cost to install Type B testable two-ply containment penetration bellows at the four units will range from \$6.7 million to \$38.66 million (Note - these estimated costs only apply to replacement or modification of two-ply bellows, and not to the costs associated with performance of a Type A test). This updated cost information for the replacement or modification of two-ply bellows is also described in Enclosure B.

ComEd respectfully requests NRC review and approval by January 29, 1995 of this proposed revision to the previously approved exemption from 10 CFR 50 Appendix J for Dresden Station and Quad Cities Station. This schedule will allow ComEd to avoid an unnecessary Type A test during the thirteenth refuel outage on Quad Cities Station Unit 2 (scheduled to start on January 29, 1995).

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with Company practice, and I believe it to be reliable.

If there are any comments or questions pertaining to this exemption request, please direct them to John L. Schrage at 708-663-7283.

Respectfully,



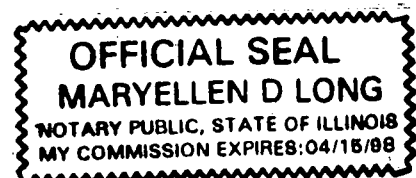
John L. Schrage
Nuclear Licensing Administrator

Enclosure A: B.A. Boger to T.J. Kovach letter dated February 6, 1992, "Exemption from the Testing Requirements of Appendix J to 10 CFR Part 50 for Dresden and Quad Cities Nuclear Power Station."

Enclosure B: Basis and Supporting Justification for the Exemption Request

- cc: J. B. Martin, Regional Administrator - RIII
 J.F. Stang, NRR Project Manager
 M. Leach, Senior Resident Inspector - Dresden
 R. M. Pulsifer, NRR Project Manager
 C. Miller, Senior Resident Inspector - Quad Cities
 R. Zimmerman, NRR CBLA Task Force
 Office of Nuclear Facility Safety - IDNS

Maryellen D. Long
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ENCLOSURE A

B. BOGER TO T. KOVACH LETTER DATED FEBRUARY 6, 1993

**EXEMPTION FROM THE TESTING REQUIREMENTS OF
APPENDIX J TO 10 CFR PART 50 FOR DRESDEN AND QUAD
CITIES NUCLEAR POWER STATIONS**