

October 30, 1995

U. S. Nuclear Regulatory Commission
Washington, DC 20555



Attn: Document Control Desk

Subject Braidwood Nuclear Power Station Units 1 and 2
 Byron Nuclear Power Station Units 1 and 2
 Dresden Nuclear Power Station Units 2
 Quad Cities Nuclear Power Station Units 1 and 2
 Zion Nuclear Power Station Units 1 and 2

Commonwealth Edison Company's (ComEd) Response to USNRC Generic Letter 88-20 Supplement 5 and Provision of Alternate Methodology for the Completion of Individual Plant Examinations for External Events (IPEEE)

NRC Dockets 50-456 and 50-457
NRC Dockets 50-454 and 50-455
NRC Dockets 50-237 and 50-249
NRC Dockets 50-254 and 50-265
NRC Dockets 50-295 and 50-304

References: (see attached)

The purpose of this letter is to inform the Nuclear Regulatory Commission of ComEd's intention to perform seismic IPEEEs using the modified procedures established in Reference (6), and update the schedule for completion and the methodology being employed in the IPEEE process for five of ComEd's six nuclear sites. (As previously discussed with the NRC staff, ComEd's submittal of Reference (5) completed the IPEEE for LaSalle.)

References (2) and (3) provided ComEd's initial response and additional information regarding schedules and general approach. ComEd's "alternate" methodology was discussed in additional detail at a meeting at NRC Headquarters on September 14, 1993. Reference (4) provided ComEd's response to NRC questions resulting from that presentation and an updated schedule.

Since that time, ComEd has had the opportunity to review the revised seismic hazards curves from Lawrence Livermore National Laboratory (LLNL) and to consult with various experts on the potential impact of those curves on the work load associated with seismic IPEEE program efforts. ComEd has concluded that the Seismic Margins Approach (SMA), as described in EPRI NP-6041, Revision 1, would be the most appropriate and resource effective method for completion of the IPEEE seismic work.

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EPRI's Fire Induced Vulnerability Evaluation (FIVE) methodology will be used in the evaluation of internal fires. This methodology was reviewed and accepted, with enhancements, by the NRC in August of 1991 for use in response to Generic Letter 88-20, Supplement 4. ComEd intends to perform more detailed analysis of those compartments not screened by FIVE.

The ComEd program for high winds, floods, and transportation and nearby facility accidents will continue to be the "progressive screening approach" as recommended in NUREG-1407.

The expected dates for submittal of the IPEEE reports are as follows:

<u>Station</u>	<u>Submittal Date</u>
Byron	December 30, 1996
Dresden	December 30, 1997
Quad Cities	December 30, 1996
Zion	December 30, 1996
Braidwood	June 30, 1997

The rationale for these schedules remains chiefly that which was stated in reference (3): the need to complete the internal events IPEs (now completed for all sites); the need to perform IPEEEs at multiple sites; and the need for coordination with the USI A-46 (SQUG) program.

With the exception of Dresden Station, none of the submittal dates represents a significant delay from the schedules which were originally contemplated in Reference (3); and are consistent with the schedules which would have been achieved under the "alternate" methodology as discussed in Reference (4). The schedules for Quad Cities and Braidwood remain unchanged from Reference (3). The schedules for Byron and Zion remain unchanged from Reference (4).

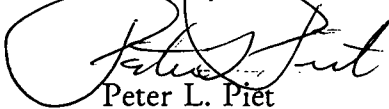
Regarding Dresden, ComEd has determined that the resources which would be applied to the IPEEE fire effort are better spent in improving other aspects of Dresden's operation and plant material condition. The IPEEE seismic and other external events portions are expected to be completed on the original schedules of June 30, 1996; and the results can be shared with the NRC in advance of the final integrated report, if desired. However, because of the magnitude and nature of the resources required, ComEd has decided to delay the start of the IPEEE fire effort so as not to divert focus from Dresden's current improvement efforts. This delay will provide some attendant benefits. For example, it will permit more efficient and effective application of ComEd's lessons learned in performing the work first at Quad Cities and the other ComEd sites. Furthermore, it will maximize the insights to be gained by permitting substantial participation by Dresden and other ComEd personnel and minimizing the use of contractors. Finally, to mitigate any negative impact of the delay, should any significant vulnerabilities be found in the

course of conducting the work at Quad Cities and the other ComEd sites, their applicability to Dresden will immediately be assessed and corrective actions implemented as necessary.

Please direct any questions regarding this office to this office.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other ComEd employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Sincerely,



Peter L. Piet

Nuclear Licensing Administrator



Mary Jo Yack 10-30-95

Attachment

cc: H. Miller, Regional Administrator-RIII
R. Capra, Director of Directorate III-2, NRR
G. Dick, Byron Project Manager, NRR
R. Assa, Braidwood Project Manager, NRR
J. Stang, Dresden Project Manager, NRR
R. Pulsifer, Quad Cities Project Manager, NRR
C. Shiraki, Zion Project Manager, NRR
S. Ray, Senior Resident Inspector (Braidwood)
H. Peterson, Senior Resident Inspector (Byron)
C. Vanderniet, Senior Resident Inspector (Dresden)
C. Miller, Senior Resident Inspector (Quad Cities)
R. Roton, Senior Resident Inspector (Zion)

ATTACHMENT

REFERENCES

- (1) Generic Letter 88-20, Supplement 4, "Individual Plant Examination of External Events for Severe Accident Vulnerabilities," dated June 28, 1991.
- (2) CECo Response to Generic Letter 88-20, Supplement 4, dated December 24, 1991.
- (3) CECo Supplemental Response to Generic Letter 88-20, Supplement 4, dated September 18, 1992.
- (4) ComEd (M.J. Vonk) letter to Dr. T. Murley, "Response to NRC Questions Regarding Commonwealth Edison Company's Alternate Method for Completion of Individual Plant Examinations for External Events (IPEEE)," dated December 9, 1993.
- (5) M.J. Vonk letter to Mr. W. Russell dated April 28, 1994.
- (6) Generic Letter 88-20, Supplement 5, "Individual Plant Examination of External Events for Severe Accident Vulnerabilities," dated September 8, 1995.