



December 15, 1995

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

Attention: Document Control Desk

Subject: Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2,
Response to NRC Review of Individual Plant Examination Submittal - Internal
Events

References: (a) J.F. Stang Letter to D.L. Farrar, dated November 9, 1995
(b) R.M. Pulsifer Letter to D.L. Farrar, dated November 9, 1995
(c) T.W. Simpkin Letter to NRR, dated September 1, 1995

References (a) and (b) provide the NRC Staff Evaluation Reports (SERs), including Technical Evaluation Reports, of the Dresden and Quad Cities Individual Plant Examinations (IPEs) for internal events. For both stations, the staff raised a number of concerns and concluded that it could not determine that ComEd has met the intent of Generic Letter 88-20.

In response to similar concerns expressed by the NRC on the Zion Station IPE, ComEd defined a resolution process that would allow ComEd and the NRC to come to closure on the identified issues. In accordance with that process, ComEd developed a "modified IPE" for Zion by making changes to the base IPE. This modified IPE, along with additional analyses on other issues raised in the SER for Zion, were submitted to the NRC in Reference (c).

Similarly, ComEd will develop a "modified Dresden and modified Quad Cities IPE" by making the following changes to the base IPEs:

- Modify the human error probabilities (HEPs) by employing the alternative Human Reliability Analysis (HRA) methodology described in Reference (c), including pre-initiator human events. An outside expert, Dr. Gareth Parry of NUS, will perform a Peer Review of the revised HEPs.
- Modify the common cause failure (CCF) factors.

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ComEd will perform additional analyses, including sensitivity studies, and provide further information to the NRC on the following issues raised in the SERs:

1. Plant-specific "support system based initiators," including loss of HVAC, Instrument Air, Service Water, Turbine Building Closed Cooling Water, AC power and DC power;
2. Specific success criteria, including the impact of pump seal leakage on the capability of the Isolation Condenser (Dresden only), room cooling issues and operator action to inhibit ADS; and
3. Plant Specific versus Generic Data (Quad Cities only).

The modified IPE's, additional analyses and further information will be submitted to the NRC by March 15, 1996. The results of the additional analyses will be evaluated to determine if additional changes to the Dresden and/or Quad Cities IPEs are warranted. If so, such changes will be made in the course of the PRA update process or included in the modified IPEs, depending on the significance of the results.

In conclusion, by following the process discussed above, the ComEd expectation is that the issues raised in References (a) and (b) can and will be resolved to the NRC's satisfaction so that the modified Dresden and Quad Cities IPEs can be viewed by the NRC as "meeting the intent of Generic Letter 88-20."

Sincerely,



Bob Rybak
Nuclear Licensing Administrator

cc: H.B. Miller, Regional Administrator, RIII
J.F. Stang, Project Manager, NRR
C.L. Vanderniet, Senior Resident Inspector, Dresden
Office of Nuclear Facility Safety, IDNS