



May 8, 1996

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 and 3
LaSalle County Nuclear Power Station Units 1 and 2
Quad Cities Nuclear Power Station Units 1 and 2
Zion Nuclear Power Station Units 1 and 2

ComEd Request for Exemption From the Requirements of 10 CFR
50.4(b)(6) For the Distribution of the Updated Final Safety Analysis
Report (UFSAR)

NRC Docket Nos. 50-456 and 50-457
NRC Docket Nos. 50-454 and 50-455
NRC Docket Nos. 50-237 and 50-249
NRC Docket Nos. 50-373 and 50-374
NRC Docket Nos. 50-254 and 50-265
NRC Docket Nos. 50-295 and 50-304

Pursuant to 10 CFR 50.12(a), ComEd requests an exemption from the requirements of 10 CFR 50.4(b)(6) regarding the distribution of additional copies of the Updated Final Safety Analysis Reports for each of the six ComEd sites. 10 CFR 50.4(b)(6) specifies the following requirement:

"(6) *Updated FSAR.* An updated Final Safety Analysis Report (FSAR) or replacement pages, pursuant to §50.71(e) must be submitted as follows: the signed original and 10 copies to the Nuclear Regulatory Commission, Document Control Desk, Washington, DC 20555, one copy to the appropriate Regional Office, and one copy to the appropriate NRC Resident Inspector if one has been assigned to the site of the facility."

7605140196 760508
PDR ADOCK 05000237
PDR

ADD 11

May 8, 1996

ComEd believes the requirement to submit 10 additional copies to the NRC staff is an unwarranted administrative burden imposed upon licensees without corresponding benefit. It is unclear if the basis for the original requirement is appropriately maintained. Advances in electronic processing of information and document reproduction have rendered the total compliance toward this regulation obsolete. As such, in lieu of submitting ten additional copies, as discussed in 10 CFR 50.4(b)(6), to the Nuclear Regulatory Commission (NRC), ComEd proposes to submit seven total copies to the NRC staff. A more complete discussion regarding the basis for the exemption request is provided as an attachment to this letter.

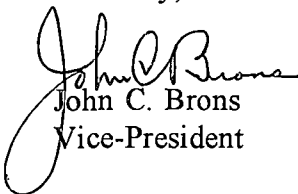
ComEd believes the cost savings recognized by the aforementioned exemption from the requirements of 10 CFR 50.4(b)(6) is significant. This cost is multiplied by the requirements specified within 10 CFR 50.71(e)(4) for biennial UFSAR revision submittals to the NRC staff. When this cost savings is computed over the life of the stations the savings would be substantial: Byron/Braidwood (15 submittals), Dresden (10 submittals), LaSalle (13 submittals), Quad Cities (10 submittals), and Zion (10 submittals).

I affirm that the content of this transmittal is true and correct to the best of my knowledge information and belief.

In order to realize the cost benefits associated with this exemption request, ComEd requests review and approval by the NRC staff within six months of receipt of this request.

If there are any questions concerning this submittal, please contact this office.

Sincerely,


John C. Brons
Vice-President

Attachment: Justification for Exemption From the Requirements of 10 CFR 50.4(b)(6)

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 8th day of May, 1996. My Commission expires on July 21, 1996.


Notary Public



May 8, 1996

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
D. Skay, LaSalle Project Manager - NRR
R. Pulsifer, Quad Cities Project Manager - NRR
C. Shiraki, Zion Project Manager - NRR
C. Phillips, Senior Resident Inspector - Braidwood
H. Peterson, Senior Resident Inspector - Byron
C. Vanderniet, Senior Resident Inspector - Dresden
P. Brochman, Senior Resident Inspector - LaSalle
C. Miller, Senior Resident Inspector - Quad Cities
R. Westberg, Senior Resident Inspector - Zion
Office of Nuclear Facility Safety - IDNS

ATTACHMENT

JUSTIFICATION FOR EXEMPTION FROM THE REQUIREMENTS OF 10 CFR 50.4(b)(6) - NRC STAFF UFSAR DISTRIBUTION

EXEMPTION

Pursuant to 10 CFR 50.12(a), ComEd requests an exemption from the requirements of 10 CFR 50.4(b)(6) regarding the distribution of additional copies of the Updated Final Safety Analysis Reports (UFSAR), including Fire Protection updates, for each of the six ComEd sites. ComEd proposes reducing the total number of copies provided to the NRC staff from thirteen to seven. The seven copies of the UFSAR will be appropriately distributed to the NRC staff offices.

DISCUSSION

10 CFR 50.4(b)(6) specifies the following requirement:

- "(6) *Updated FSAR.* An updated Final Safety Analysis Report (FSAR) or replacement pages, pursuant to §50.71(e) must be submitted as follows: the signed original and 10 copies to the Nuclear Regulatory Commission, Document Control Desk, Washington, DC 20555, one copy to the appropriate Regional Office, and one copy to the appropriate NRC Resident Inspector if one has been assigned to the site of the facility."

ComEd believes the requirement to submit 10 additional copies to the NRC staff is an unwarranted administrative burden imposed upon licensees without corresponding benefit. It is unclear if the basis for the original requirement is appropriately maintained. Advances in electronic processing of information and document reproduction have rendered the total compliance toward this regulation obsolete. As such, in lieu of submitting ten additional copies, as discussed in 10 CFR 50.4(b)(6), to the Nuclear Regulatory Commission (NRC), ComEd proposes to submit seven total copies to the NRC staff. However, to ensure that appropriate NRC staff personnel continue to receive the necessary minimum quantity of UFSAR information, ComEd will submit copies to the following NRC staff locations:

- Original to the Document Control Desk
- Four copies to NRR staff offices (to be used for the NRR Project Manager, the NRR Emergency Response Center, the NRR Operations Area, the NRR Office of General Counsel)
- One copy to the Region III Office
- One copy to the Site Senior Resident Inspector's Office.

The above distribution ensures sufficient updates are distributed to all appropriate NRC staff office locations.

ATTACHMENT (continued)

ComEd's proposed exemption request continues to ensure that the NRC staff receives adequate updated information from the sites regarding the latest version of the Updated Final Safety Analysis Report. In addition, the maintenance of the Document Control Desk on the distribution list ensures that the availability of overall general public information is not adversely hindered.

The proposed exemption request is the reduction of an administrative requirement and has no impact on the safe operation of the facility. As such, the proposed exemption request satisfies the requirements specified by 10 CFR 50.12 as discussed below.

BASIS

A. Criteria for Granting Exemptions Are Met per 10 CFR 50.12(a)(1)

1. *The Requested Exemptions and the Activities Which Would be Allowed Thereunder Are Authorized by Law*

If the criteria established in 10 CFR 50.12(a) are satisfied, as they are in this case, and if no other prohibition of law exists to preclude the activities which would be authorized by the requested exemption, and there are no such prohibitions, the Commission is authorized by law to grant this exemption request.

2. *The Requested Exemption Will Not Present Undue Risk to the public health and safety.*

The proposed exemption request is the reduction of an administrative requirement and has no impact on the safe operation of the facility. The maintenance of the Document Control Desk on the distribution list ensures that the availability of overall general public information is not adversely hindered. Therefore, Public participation and knowledge regarding revisions to the plant's UFSAR will not be adversely impacted by the proposed exemption. As such, the requested exemption will not present undue risk to the public health and safety.

3. *The Requested Exemption is consistent with the common defense and security.*

The proposed exemption request is a purely administrative change that does not affect the operation of the facility in any manner. As such, the common defense and security are unaffected by the proposed exemption request.

B. At Least One of the Special Circumstances Are Present Per 10 CFR 50.12(a)(2)

ATTACHMENT (continued)

1. *The Requested Exemptions Will Avoid Undue Hardship or Costs*

The requested exemption is proposed to reduce undue costs associated with the dissemination of redundant information to the NRC staff offices. This cost is multiplied by the requirements specified within 10 CFR 50.71(e)(4) for biennial UFSAR revision submittals to the NRC staff. Based upon the current license expiration dates associated with each of the six ComEd nuclear stations, ComEd projects the cost savings associated with the aforementioned exemption to be significant. As such, the requested exemption will avoid undue costs.