



October 31, 1996

U.S. Nuclear Regulatory Commission  
Attn. Document Control Desk  
Washington, D.C. 20555

Subject:               Dresden Station Units 2 and 3  
                      Quad Cities Station Units 1 and 2  
                      Initial Response to IE Bulletin 96-03  
                      NRC Dockets 50-237 and 50-249  
                      NRC Dockets 50-254 and 50-265

Reference:            1).    D.J. Chrzanowski letters to NRC dated June 10, 1993  
                      2).    L.O. DelGeorge letter to NRC dated April 19, 1994  
                      3).    I.M. Johnson letter to NRC dated November 14, 1995

On May 6, 1996 the NRC issued the subject IE Bulletin requesting that all Boiling Water Reactor (BWR) licensees take the following actions:

1.    Implement appropriate procedural measures and plant modifications to minimize the potential for clogging of the Emergency Core Cooling System (ECCS) Suppression Pool Suction Strainers by debris that may be generated during a Loss of Coolant Accident (LOCA) by the end of the first refueling outage starting after January 1, 1997.
2.    Provide a report within 180 days of the date of the Bulletin describing the actions to be taken, the mitigative strategies to be used and a schedule for implementation.
3.    Within 30 days of completion of all requested actions, provide a report confirming completion and summarizing any actions taken.

As Dresden Station Unit 3 and Quad Cities Station Unit 2 have Spring 1997 outages, ComEd is providing this initial response to the Bulletin for all four units. ComEd is participating in the Boiling Water Reactor Owners Group (BWROG) committee established in response to this issue. ComEd has determined that Option 1, the installation of large capacity passive strainers, is the most viable solution. ComEd plans to use the analytical methodologies being developed by the BWROG as a guideline to size the new passive strainers necessary to comply with Bulletin 96-03.

It is the intent of ComEd to install new strainers of sufficient size to resolve this issue at the next scheduled refueling outage for each of the units, including those with Spring 1997 outages. At this time, considerable engineering work must be completed before installation can proceed for those Spring 1997 outages. Given the existing small margins in both net positive

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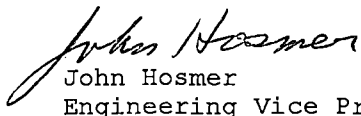
suction head and penetration loads, NRC approval may be necessary in order to proceed with installation of these new strainers. If ComEd determines that NRC review and approval is necessary then a submittal will be made by December 1, 1996. NRC review and approval will be required by February 1, 1997. In this instance ComEd will, at its own risk, proceed with the design and procurement of these new strainers while waiting for NRC approval.

If larger strainers cannot be installed in the Spring 1997 refueling outages then the existing compensatory measures implemented for IE Bulletins 93-02, 93-02 Supplement 1 and 95-02 will remain in place (References 1,2 and 3). In addition, Dresden Unit 3 and Quad Cities Unit 2 will both desludge their suppression pool and undertake a program to reduce the sources of fibrous insulation in those outages.

Although ComEd is conservatively sizing these new strainers, we realize that NRC approval of the BWROG methodologies will not occur until after their procurement. Therefore, until the BWROG methodologies are approved by the NRC, these new strainers will be considered only an interim solution and this response to the Bulletin incomplete. A final and complete response will be submitted within 60 days after the BWROG Utility Resolution Guidance report is approved by the NRC.

If there are any questions, please contact this office.

Sincerely,

  
John Hosmer  
Engineering Vice President

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