

February 26, 1997

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

Request for Deferral with

Compliance to IE Bulletin 96-03 NRC Docket Nos. 50-237 and 50-249 NRC Docket Nos. 50-254 and 50-265

Reference:

1). J. Hosmer letter to NRC dated October 31, 1996

On May 6, 1996 the NRC issued IE Bulletin 96-03 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.

Reference 1) provided Commonwealth Edison's (ComEd's) interim response to IE Bulletin 96-03 for Dresden Station Units 2 and 3 and Quad Cities Station Units 1 and 2. Our response stated that ComEd has determined that the installation of large capacity passive strainers is the most viable solution; 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; and finally ComEd plans to use the analytical methodologies being developed by the Boiling Water Reactor Owners Group (BWROG) as a guideline to demonstrate the adequacy of the new large capacity strainers in meeting the requirements of Bulletin 96-03.

It was our intent not to request deferral for compliance with IE Bulletin 96-03 for those units with a Spring 1997 outage (Dresden Unit 3 and Quad Cities Unit 2) as ComEd expected that resolution with the NRC on the acceptability of the BWROG approach would occur by the end of January 1997. This timeframe would have allowed the preparation and submittal of a final and complete response for all four units within 60 days after the BWROG Utility Resolution

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Guidance documentation is approved by the NRC. Given the current status of the review process, ComEd has decided to request deferral for compliance with IE Bulletin 96-03 for Dresden Unit 3 and Quad Cities Unit 2 until December 31, 1998. The sole purpose for the request for deferral is that ComEd feels that it can not demonstrate complete compliance with IE Bulletin 96-03 until some resolution is reached on the acceptability of the BWROG approach.

However, it is $\underline{\text{still}}$ ComEd's intent to install larger strainers in the upcoming Spring 1997 outages for Dresden Unit 3 and Quad Cities Unit 2. 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.

If there are any questions, please contact this office.

Sincerely,

John Hosmer

Engineering Vice President

cc: A. Beach, Regional Administrator-RIII

J. Stang, Dresden Project Manager-NRR/PDIII-2

R. Pulsifer, Quad Cities Project Manager-NRR/PDIII-2

K. Riemer, Senior Resident Inspector (Dresden)

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T. Green, BWROG

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