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July 25, 1980

Mr. D.G. Eisenhut, Director
 Division of Licensing
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Subject: Dresden Units 2 and 3
 Quad Cities Units 1 and 2
 Zion Units 1 and 2
 Postponement of Certain NRC
 Requested Actions
 NRC Docket No's 50-237/249, 50-254/265
 and 50-295/304

Due to financial and technical manpower limitations the Commonwealth Edison engineering staff has carefully reviewed our planned activities and estimated expenditures for the next twelve (12) months. As a result of this review certain activities related to NRC requests were identified, which in our judgement should be postponed until July 1981. Following is a summary list of the activities which we plan to postpone and the bases for our judgement to postpone each activity.

1. TMI studies resulting from your letter dated May 7, 1980. These postponed TMI studies involve Commonwealth Edison Company unique studies only. Our participation in Owners Group studies will continue in accordance with current schedules. Postponing starting these studies until July 1981 will necessarily cause a postponement of any modifications resulting from these studies. The studies to be postponed are detailed in Attachment A to this letter.

Schedule:

Stop Studies - July 1980
 Restart Studies - July, 1981
 Complete Studies - Twelve (12) month delay of NRC/Date
 Complete Modifications - Twelve(12) month delay of NRC date

2. IE Bulletin 80-11 Masonry Wall Design Studies. The study phase which involved identifying concrete block walls with potential safety related functions has been completed. The start of the next phase involving seismic analysis of each of the walls identified will be postponed until July 1981.

Schedule:

Stop Analysis - July, 1980
 Restart Analysis - July, 1981
 Complete Analysis & Report - November 1981

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Our basis for postponing the detailed analysis is described in Attachment B to this letter. The basis was primarily the following observations during the first phase of this study.

- a. For Dresden, Quad-Cities and Zion Stations block walls are not structural elements in any safety related structure.

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- b. No safety-related pipe supports are attached by expansion anchors to block walls at any of the three stations.
3. Dresden Unit 2 Systematic Evaluation Program study to review the potential for system interactions due to seismic loads. This review was recommended by the NRC Senior Seismic Review Team in their report for Dresden Unit 2.

Schedule:

Stop Study - July, 1980
Restart Study - July, 1981
Complete Study - October, 1981

Since this study is primarily a confirmation that all substantial seismic interaction concerns were identified specifically by the SSRT, postponing this work has no direct safety significance with this twelve(12) month postponement, the interaction review will still be completed within the SEP time frame. The details of our evaluation are included in Attachment C to this letter.

4. Study for Dresden Units 2 and 3 and Quad-Cities Units 1 and 2 IE Bulletin 79-14 - "Seismic Analysis for As-Built Safety Related Piping Systems. The documentation and review of the as-built safety-related piping systems has been completed. Deviations from design identified during this as-built documentation phase were evaluated for system operability and any required corrective measures were taken. The final analysis of all piping systems with the as-built configurations is currently in progress.

Schedule:

Stop Analyses - July, 1980
Restart Analyses - July, 1981
Complete Analyses - October, 1982

In our judgement all the safety related piping systems currently will meet the operability criteria. This judgement was drawn from the following results to date.

- a. A very limited number of piping operability deviations were identified during the field inspections and all field identified operability deviation were corrected.
- b. To date the reanalyses have not identified any deviations from operability criteria.

More details of our evaluation are included in Attachment D to this letter.

Under the current severe financial strain caused by inadequate rate relief and an estimated \$600 million budget for post TMI modifications, it is essential that we stop or postpone nuclear plant activities which involve less than substantial safety considerations. For the reasons discussed we have determined that the four (4) activities listed in the preceding paragraph should be postponed. We remain

committed to completing these activities as expeditious as possible when they are restarted in July 1981. To maximize the cost reduction from these postponements, we will begin immediately an orderly termination of any of these four(4) activities which are currently in progress. Activities which have not been initiated will not be initiated until July 1981.

If you have any questions or comments contact me.

Very truly yours,



C. Reed

JSA/sb/5520A

Attachments

cc: V.J. Stello
J.G. Keppler

ATTACHMENT A

TMI Studies for May 7, 1980 Letter from Eisenhut

Control Room Habitability (III.D.3)
Dresden, Quad Cities and Zion
For Plant Specific Analysis

This item requires that control room habitability be reviewed against the latest standards for hazard evaluation by January 1, 1981, and that modifications be made to upgrade the design by January 1, 1983. Postponing this study one year will have little net safety effect since as part of our fire protection commitments, supplied air systems will be available in our control rooms in the event of habitability problems due to airborne hazards and, if habitability of the control room is lost completely, safe shutdown of the plants is possible from outside the control room.

HPCI/RCIC Space Cooling (II.K.3.24)
Dresden and Quad Cities
For Plant Specific Analysis

This item calls for RCIC and HPCI to be designed to withstand a complete loss of alternating current to their support systems for at least two hours. A one-year delay in completing this study is not a substantial safety concern; however, these systems are powered by redundant emergency AC power systems. Safe shutdown studies done as part of the plant Fire Protection reviews have shown the capability to safely shut down in the event of severe power supply system damage.

Separate HPCI/RCIC Initiation (II.K.3.13)
Quad Cities Station Only
For Plant Specific Analysis

This item calls for RCIC to be modified to initiate at a higher water level than HPCI, for the purpose of reducing HPCI system challenges and cold water injection to the reactor vessel. Since for Quad Cities Station, the number of challenges to HPCI is small, the study of potential incremental improvements is not urgent. A one-year delay of this study involves no substantial safety concern.

Study to Demonstrate Performance of Isolation
Condensers with Noncondensibles (II.K.3.29)
Dresden Station Only
For Plant Specific Study

This item calls for a study of the effect of noncondensable gas on natural circulation systems that play a role in plant depressurization following a small-break LOCA. A one-year delay in completing this study would have little net safety effect since the isolation condenser is not an ECCS system and its availability is not assumed in our present Appendix K analysis.

ATTACHMENT A

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Installation and Testing of Automatic
PORV Isolation System (II.K.3.1)
Zion Station Only
For Plant Specific Design Work

This item requires that licensees document proposed changes to automatically close PORV block valves if system pressure decays below safe levels following PORV actuation. This item has a due date of July 1, 1981; postponing this item three months into the next fiscal year would have little overall safety impact.

ATTACHMENT B

IE Bulletin 80-11 Block Walls

As of July 1980, the results of the current field surveys for each plant are as follows:

Dresden

- 350 total block walls in plant.
- 97 of the 350 have been identified as safety-related, i.e., near safety-related equipment or support safety-related equipment.
- 62 of the 97 safety-related walls have attachments to them.
- 15 of the 62 walls with attachments have attachments in excess of 100 pounds but less than 1,000 pounds.
- 35 safety-related walls have no attachments to them.

Quad Cities

- 255 total block walls in plant.
- 84 of the 255 have been identified as safety-related
- 24 of the 84 safety-related walls have attachments to them.
- 6 of the 24 walls with attachments have attachments in excess of 100 pounds but less than 1,000 pounds.
- 60 safety-related walls have no attachments to them.

Zion

- 220 total block walls in plant.
- 135 of the 200 walls have been identified as safety-related.
- 23 of the 135 safety-related walls, while being identified as safety-related from the drawings, have not been surveyed in the field as they were inaccessible at the time of the original survey.
- 65 of the 135 safety-related walls have attachments to them.
- 49 of the 65 safety-related walls have 9 or fewer attachments to them.
- 16 of the 65 safety-related walls have 10 or more attachments to them.
- 47 safety-related walls have no attachments to them.

Preliminary analyses were performed for several walls which were surveyed at each plant. These walls were the most heavily loaded walls found during the survey or randomly selected walls. Results of these preliminary analyses showed that the walls could withstand with substantial margin the Operating Basis Earthquake. While this does not conclusively prove all walls are able to meet the bulletin requirements, it does show that the conservatism incorporated into the original design are of such magnitude that a postponement of additional analyses is justified. Attached is a list of the conservatisms found in the design of the masonry walls.

ATTACHMENT B.1

The following is a list of conservative items concerning the concrete masonry walls at Dresden 2/3, Quad Cities 1/2 and Zion 1/2.

- Masonry walls are not subjected to wind, tornadoes or pipe break loads except the Dresden 2/3 Cribhours.
- No safety-related pipe hangers were identified as being attached to concrete masonry walls with expansion anchors under the I.E. Bulletin 79-02 inspection.
- The majority of walls have few attachments with large loads.
- Block walls are not structural elements in any safety-related buildings.

ATTACHMENT C

Dresden 2 Seismic Study for SEP - Interaction Review

The Senior Seismic Review Team (SSRT) has studied and walked through Dresden 2. The SSRT has given Dresden 2 a qualified acceptance predicated on three major exceptions: 1) that safety-related electrical equipment be checked for proper anchorage 2) that a list of specific items be evaluated and upgraded as required and 3) that a general seismic interaction reconnaissance of the plant be made and items upgraded as required. The first two items are being pursued at this time since it is believed they will contribute the most to our knowledge about the plant safety margins. The third item is one which requires an extensive effort for minimal gain in knowledge. The leading experts in the country have walked through the plant looking for these types of problems and none were noted. However, to assure that nothing was missed, since the walkdown was not a 100% review, the SSRT is requiring the plant to do a complete review.

Commonwealth Edison feels the start of seismic interaction study could be delayed until at least July 1981 due to the low probability of a major seismic event in the Central Stable Region coupled with the fact that systems in power plants have an inherent seismic capability, and the specific concerns identified by the SSRT are being addressed on an immediate basis.

ATTACHMENT D

Dresden and Quad-Cities IE Bulletin 79-14 Seismic Analysis For As-Built Safety Related Piping Systems

The NRC issued I.E. Bulletin, 79-14 in July 1979, asking licensees to verify that the safety-related piping systems seismic analysis actually matched the as-built condition. Since Dresden and Quad Cities stations lacked as-built drawings, the as-built condition had to be verified and recorded. Then a comparison had to be made between as-built and as designed to determine where discrepancies existed. For large diameter (greater than 10" at Quad Cities and 12" at Dresden) the stress analysis was done by computer code and an isometric exists. Therefore, significant problems (i.e. missing hangers) could be analyzed for operability immediately. A very limited number of operability deviations were identified, and all were corrected consistent with Technical Specification requirements.

Reanalysis of several systems has been in progress since March, 1980. To date no significant problems have arisen. There will be modifications necessary at both stations, however, no operability problems have been found.

For these reasons:

1. Significant problems taken care of during field walkdowns and
2. Positive results of the reanalysis done so far

postponing the rest of the reanalysis for economic reasons does not jeopardize the health and safety of the public or the safe shutdown capability the units.