ISHAM, LINCOLN & BEALE COUNSELORS AT LAW

ONE FIRST NATIONAL PLAZA FORTY-SECOND FLOOR CHICAGO, ILLINOIS 60603

TELEPHONE 312-558-7500 TELEX: 2-5288

CONNECTICUT AVENUE, N. W. SUITE 325 WASHINGTON, D. C. 20036 202-833-9730

USNRC

Office of the Secretary

Docketing & Service

September 29, 1980

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of Dockets Nos. 50. 50-COMMONWEALTH EDISON COMPANY (Spent Fuel Pool (Dresden Station, Units 2 & 3) Modification)

Dear Board Members:

Enclosed is a complete set of Commonwealth Edison Company's responses to NRC Staff technical review questions which, together with the Licensing Report, provided the basis for the Staff's Safety Evaluation in this docket. Some of the pages in the January 12, 1979 submittal are difficult to read; better copies of the pages were provided with the January 24, 1979 submittal. The Board's attention is also drawn to the response to Question Number 10 in Edison's May 30, 1979 submittal. This includes as an attachment an analysis of the consequences of a heavy drop accident in the spent fuel pool at Dresden originally submitted to the NRC on May 31, 1973. Parts II and III of that analysis, which state that in the event of a loss of water accident in the spent fuel pool, 16 month-old stored spent fuel would not melt, are potentially misleading in that these 1973 analyses of course did not take into account the effects of the spent fuel storage capacity expansion requested in this docket. Commonwealth Edison has not done any studies to determine whether spent fuel stored in the proposed racks would melt if a loss of water accident were to occur.

In a few weeks Commonwealth Edison will be sending you an update to the Licensing Report originally submitted with the application in this matter on May 11, 1978.

There is a further set of information in this case

DS03/

which I am not sending you. These are responses to questions from the State of Illinois provided as part of settlement negotiations earlier this year. The Staff has been provided with copies of these responses. Commonwealth Edison would prefer that the tentative concessions both sides were willing to offer in efforts to reach a compromise not become part of the formal record of this proceeding or influence the decision—makers. This is of course in accordance with the usual rule of evidence regarding settlement negotiations. I merely bring your attention to the existence of these responses in the event they surface in some way in the evidentiary hearings in November.

singerely

Philip Steptoe

PS/ Enc.

cc: Dresden Service List