



**Commonwealth Edison**  
 One First National Plaza, Chicago, Illinois  
 Address Reply to: Post Office Box 767  
 Chicago, Illinois 60690

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February 4, 1981

Mr. Darrell G. Eisenhut, Director  
 Division of Licensing  
 Office of Nuclear Reactor Regulation  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

Subject: Dresden Station Unit 2  
 Redirection of Systematic  
 Evaluation Program  
NRC Docket No. 50-237

Dear Mr. Eisenhut:

Commonwealth Edison received your letter of January 14, 1981, and concurs that the majority of the commitments specified were agreed to in meetings among the SEP Owners with representatives of the NRC SEP staff. Specifically, the SEP Owners Group program provides that: (1) 60% of the topic assessments are to be completed by the end of June, 1981; (2) not all topics can be completed by the end of June, 1981 because of long-lead characteristics or inadequate definition of applicable criteria; and (3) there be a lead topic concept to identify an SEP plant responsible to actively support the staff reviewers in their development of the initial draft topic assessment for each topic whose review has not begun. There is the possibility that all topics may not be addressed under the program by the end of June, 1981; however, that does not preclude achieving the other staff goals within that time frame.

The nine SEP Owners Group plants (Dresden 1 is not being actively pursued at this time) represent 1233 SEP Topics for resolution such that orderly and complete SER's can be issued for each plant. As of January 9, 1981, 504 of those topics were identified as deferred from the SEP as generic issues or were not applicable to SEP. In addition, 207 topics had draft or final SER's issued. The SEP Owners Group will review the draft SER's and apply the findings where possible in generating assessments of that topic to other plants. The first order of business in the 90 day trial period is to complete the draft SER's and to generate topic assessments on each of the topics where the staff has issued SER's. It is anticipated that the draft SER's issued by January 15, 1981 will be processed and returned to the staff in 30 days from date of receipt.

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In order for these goals to be realized by the staff and the SEP Owners Group, the staff's resources are expected to be concentrated toward prompt issuance of draft SER's and 30 day review response on licensee topic assessment submittals. Since the staff has employed consultants to perform certain evaluations, particularly electrical, instrumentation and control, it would appear expedient for the consultants to develop draft SER's on each of their topics for each of the plants, rather than have them judge a licensee's topic assessment and then generate an SER.

In response to the conditions specified in your January 14, 1981 letter:

1. Commonwealth Edison agrees to complete SEP topic assessments for staff review by June 30, 1981 such that a 60% aggregate total of assessments shall have been submitted for review.
2. Commonwealth Edison commits to actively support the NRC staff in their review and development of the initial draft topic assessments by June 1981. However, it should be noted on some long-lead time items the staff may not be able to complete the initial topic assessments by June 1981 due to the large amount of effort that may be required.
3. Commonwealth Edison as members of the SEP Owners Group agree to the 90-day trial period.
4. Commonwealth Edison sees no need to return to the "Lead Plant" concept.
5. This condition is unique to Consumers Power Company. If the staff is considering expanding this condition to include other licensees, Commonwealth Edison would object strongly to assigning a local representative in Bethesda.
6. Commonwealth Edison agrees that the SEP Owners Group should meet periodically (bi-monthly) with NRC SEP management to discuss SEP progress and program planning.
7. Commonwealth Edison agrees to make it's best effort to process draft SER's and advise the NRC SEP staff of findings within the 30 day response period.

Commonwealth Edison and the SEP Owners Group appreciates the staff's adoption of the Owners Group plan to implement resolution of SEP topics preparatory to the development of the

integrated assessment position of the program for each of the SEP plants. It is anticipated that the condition commitments specified above satisfies the staff requirements to attain topic resolution.

The lead topics assigned to Commonwealth Edison are II-2.A, II-4.A, II-4.B, II-4.C, II-4.E, III-6, III-7.B III-10.C, III-11, VI-1, IX-5 and XV-7. Edison believes the essentially complete lead topics are:

- II-2.A Severe Weather Phenomena
- II-4.A Tectonic Province
- II-4.B Proximity of Capable Tectonic Structure in Plant Vicinity
- II-4.C Historical Seismicity within 200 Miles of Plant
- III.10.C Surveillance Requirements on BWR Recirculation Pumps and Discharge Valves.

Topic III-6, Seismic Design Considerations has had considerable efforts by both the staff and Edison expended on it. Edison will work closely with the staff in resolving the remaining outstanding items.

Lead topics for which Edison has had no correspondence with the staff are:

- II-4.E Dam Integrity
- III-7.B Design Codes, Criteria, Load Combinations
- III-11 Component Integrity
- VI-1 Organic Materials and Post-Accident Chemistry
- IX-5 Ventilation Systems
- XV-7 Reactor Coolant Pumps Rotor Seismic and Reactor Coolant Pumps Shaft Break

For these topics we suggest that the initial contact on the above topics be a telephone contact between the NRC Project Manager and Edison to determine the general areas of discussion the staff wishes to pursue. This will enable a conference call to be set up with the appropriate personnel from both the staff and Edison.

Commonwealth Edison believes the NRC status 6 or higher, generic or not applicable topics are:

II-2.A	V-6	VII-5
II-2.B	V-7	VVII-6
II-2.D	V-8	VII-7
II-4.A	V-9	VIII-1.A
II-4.B	V-10.A	VIII-3.A
II-4.C	V-11.A	VIII-3.B
II-5.B	V-12.A	IX-2
III-3.B	V-13	IX-4
III-7.A	VI-2.A	IX-6
III-7.C	VI-2.B	X
III-8.A	VI-2.C	XI-1
III-8.B	VI-6	XI-2
III-8.C	VI-7.A.1	XIII-1
III-8.D	VI-7.A.2	XIII-2
III-9	VI-7.A.4	XV-2
III-10.A	VI-7.B	XV-6
III-10.B	VI-7.C.3	XV-10
III-10.C	VI-7.D	XV-11
IV-1.A	VI-7.E	XV-12
IV-3	VI-7.F	XV-17
V-1	VI-8	XV-21
V-2	VI-9.A	XV-22
V-3	VI-10.B	XV-23
V-4	VII-1.B	XV-24
V-5	VII-4	XVII

The following topics have been transmitted to Edison and comments will be provided by the end of February for the following topics: V-10.B, V-11.B, VII-3, VIII-2, IX-3.

The topics for which Edison commits to submit to the staff for their review by April 30, 1981 are:

<u>TOPIC #</u>	<u>TITLE</u>
II-1.	A. Exclusion Area Authority and Control B. Population Distribution
III-7.	D. Containment Structural Integrity Tests
XV-20	Radiological Consequences of Fuel Damaging Accidents (Inside and Outside Containment)

Before June 1981 we will submit topic II-2.C, Atmospheric Transport and Diffusion Characteristics for Accident Analysis.

Commonwealth Edison and the SEP Owners Group are concerned that SECY-81-13 as discussed during a Commissioner's briefing on January 14, 1981 and made publicly available that same date may preclude the orderly completion of SEP as presently constituted. SECY-81-13 appears to state that the present SEP addresses the Section 110 of Public Law 96-295 because the topics were obtained from an engineering issue approach which reviewed at least 1100 issues to determine those issues of greater potential safety significance. The 137 issues culled from the list are those deemed to have the greatest potential for safety significance and therefore, addresses Section 110 requirements to review particularly significant safety requirements. The reason this approach is not being used for the remaining operating units is the industry and not the staff will be required to perform the review. If this understanding of SECY-81-13 is incorrect in any major way and new requirements are imposed upon SEP as a result of the implementation of SECY-81-13, total reevaluation of SEP and its scheduled completion will be required.

Please address any questions you may have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this transmittal have been provided for your use.

Very truly yours,



Robert F. Janecek  
Nuclear Licensing Administrator  
Boiling Water Reactors

cc: RIII Inspector - Dresden