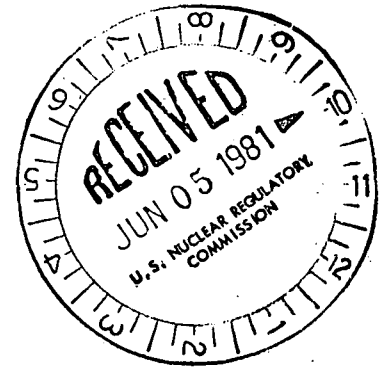




**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

June 1, 1981



Dennis M. Crutchfield, Chief  
Operating Reactors Branch #5  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Dresden 2  
SEP Topic II-1.A, Exclusion Area Authority and  
Control  
NRC Docket 50-237

Reference (a): R.F. Janecek letter to D.G. Eisenhut dated  
February 4, 1981

Dear Mr. Crutchfield:

Attached is the final SEP topic assessment prepared in response to our commitments made in Reference (a). The attached assessment for the above referenced topic was patterned after the completed topic assessments prepared by the NRC and given to us as examples to be used in preparing our assessments.

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 Resident Inspector-Dresden  
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Dresden Nuclear Power Station, Units No.2  
SEP Safety Assessment Report  
Topic II-1.A-Exclusion Area Authority and Control

Introduction

The safety objection of this topic is to assure that appropriate exclusion area authority and control are maintained by the licensee as required by 10CFR Part 100. The review was conducted in accordance with the guidance given in SRP Section 2.1.2. The capacity of the plant to meet potential radiation dose criteria of 10CFR 100 in the exclusion area has been evaluated in the Unit 2 and 3 FSAR (1) and Units 2 and 3 Amendment 17/18(2).

Criteria

Standard Review Plan Section 2.1.2 states that:

Prior to the issuance of a construction permit or limited work authorization, the applicant must demonstrate that it has the authority within the exclusion area as required by Part 100.3(a), or must provide reasonable assurance that it will have such authority prior to start of construction. Absolute ownership of all lands within the exclusion area, including mineral rights, is considered to carry with it the required authority to determine all activities on this land and is acceptable.

Standard Review Plan Section 2.1.2 also states that:

Where the designated exclusion area extends into bodies of water such as a lake, reservoir, or river which is routinely accessible to the public, the reviewer must determine that the applicant has made appropriate arrangements with the local, state, federal, or other public agency having authority over the particular body of water and the arrangements made provide for the exclusion and ready removal in an emergency, by either the applicant or the public agency in authority, of any persons on these portions of the body of water which lie within the designated exclusion area.

Discussion

The Dresden Nuclear Generating Station is located in Goose Lake Township, Grundy County in the State of Illinois. The plant site is approximately 14 miles southwest of the city of Joliet, Illinois and 25 miles south of Aurora, Illinois. The site property comprising approximately 953 acres, with approximately 450 acres leased to neighboring farmer for cattle grazing and field crops. The lease has been modified with a clause which allows Commonwealth Edison to have "sole authority to determine the right of access and the right to be present in the area covered by this lease" when the Generating Station Emergency Plan (GSEP) is in effect. In addition to Unit 2, Unit 1 and 3 also occupy part of the site. No public highways or railroads transverse the exclusion area. The exclusion area and principle plant structures are shown in attached Figure 2.2.1, which is a common exclusion area for all three nuclear units.

The exclusion area radius of 800 meters is defined in Section 1.2 of the Commonwealth Edison-GSEP (3). Through direct ownership including mineral rights or a lease agreement with the State of Illinois the licensee has total control of the entire exclusion area with the exception of control over the Des Plaines and Kankakee Rivers. As a result, arrangements have been made through ESDA and DNS with the U.S. Coast Guard and documented in the Commonwealth Edison Generating Station Emergency Plan (4) for the control of the water traffic in event of a plant emergency.

### Conclusion

It is concluded that the Dresden licensee, which controls all the land within the exclusion area, has the proper authority as required by 10CFR Part 100 to determine all activities on the land within the exclusion area. Commonwealth Edison has also demonstrated its ability to control water traffic within the exclusion area. Thus it is concluded that Commonwealth Edison meets the exclusion area requirements.

### References

- (1) Dresden Units 2 and 3 - FSAR Section 2.9
- (2) Dresden Units 2 and 3 - Amendment 17/18 Table 1
- (3) Commonwealth Edison - GSEP Section 1.2
- (4) Commonwealth Edison - GSEP Table 6.1-5  
IPLA Concept of Operations - Figure 4.2-1  
Section 4.7.4