

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )  
COMMONWEALTH EDISON COMPANY ) Docket Nos. 50-237-SP  
(Dresden Station, Units 2 and 3) (Spent Fuel Pool Modification) ) 50-249-SP

AFFIDAVIT OF ROBERT F. JANECEK

STATE OF ILLINOIS )  
COUNTY OF COOK ) SS.

My name is Robert F. Janecek. My experience and credentials were previously provided in my affidavit in response to Board Question No. 2 which was submitted on March 18, 1981. The only change since that time is my reassignment within Commonwealth Edison Company from Nuclear Licensing Administrator to Supervising Design Engineer in the Station Nuclear Engineering Department.

The purpose of this affidavit is to inform the Board of a possible change of plans concerning the disposition of the old spent fuel storage racks after their removal from the Dresden Units 2 and 3 spent fuel pools.

Quad Cities Station Units 1 and 2 will lose full core discharge capability (FCDC) following the upcoming Quad Cities 2 refueling outage in September, 1981. The Quad Cities Nuclear Station has authority to install 146 storage racks of the design currently utilized at both the Dresden and Quad Cities Nuclear Stations. There are only 114 racks presently located in the Quad Cities spent

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fuel pools. In order to maintain FCDC at Quad Cities after the September 1981 refueling outage, Commonwealth Edison will have to install eight racks (current authorized design) into the Quad Cities spent fuel pools. An additional seventeen racks may have to be installed to maintain FCDC after the Quad Cities refueling outage in September, 1982.

There are unused racks of the design currently authorized for use at Quad Cities located at the Dresden and Quad Cities Nuclear Stations. These racks have not as yet been inspected. Depending upon the results of these inspections, Commonwealth Edison may need to relocate spent fuel storage racks removed from Dresden 2 and 3 to Quad Cities for installation. The racks which would potentially be relocated from Dresden to Quad Cities are identical to the racks currently installed in the Quad Cities spent fuel pools. The number of racks to be relocated would be between 0 and 25, depending upon the availability of the existing but as yet unused racks.

Any Dresden racks to be relocated to Quad Cities will be physically removed from the Dresden spent fuel pools according to the methods and procedures described in the testimony of Ron Ragan introduced into evidence at the hearings. The racks will be decontaminated by hydrolazing, inspected and then shipped to Quad Cities. Occupational exposure to Dresden workers per rack disposed due to this relocation operation will be no greater than the exposure for disposal of the racks presented in the testimony at

hearing. Indeed, the occupational exposure may be less than that presented at hearing, because analysis of the results of hydrolazing indicate that decontamination of the Dresden racks may be more successful than originally anticipated.

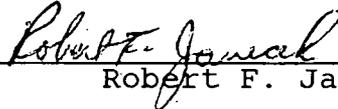
Once at Quad Cities Nuclear Station, the relocated racks will be subjected to a receipt inspection and installed according to methods previously evaluated and found acceptable by the NRC Staff. During the entire relocation operation, at both the Dresden and Quad Cities stations, the racks will not be carried over spent fuel at any time.

The NRC Staff has been notified of the possibility of relocating currently authorized racks from Dresden to Quad Cities.

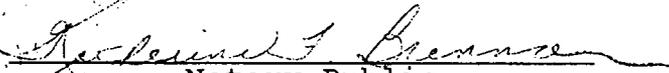
Commonwealth Edison will proceed with relocating up to eight Dresden racks, provided such relocation is necessary to maintain FCDC at Quad Cities after the September 1981 refueling outage, without waiting for the Board's decision in this proceeding unless ordered by the Board to do otherwise. No more than eight Dresden racks will be relocated to Quad Cities before the Licensing Board rules on the operating license amendments the subject of this proceeding. Commonwealth Edison will not effectuate any rack transfer, however, before September 1, 1981. The relocation of up to eight racks from Dresden Nuclear Station to Quad Cities Nuclear Station will not alter Dresden Nuclear Station's current FCDC capability. We realize that there is no

assurance that the Board will ultimately approve the new Dresden storage racks. Commonwealth Edison believes, however, that the decision to relocate racks from Dresden to Quad Cities is a prudent business decision.

Respectfully submitted,

  
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Robert F. Janecek

SUBSCRIBED AND SWORN TO before  
me this 4<sup>th</sup> day of July, 1981.

  
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Notary Public