



Commonwealth Edison
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Address Reply to: Post Office Box 767
Chicago, Illinois 60690



September 1, 1981

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

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
Responses to NUREG 0737 Items
Requiring a September 1, 1981,
Submittal
NRC Docket Nos. 50-237/249,
50-254/265 and 50-295/304

Reference (a): L. O. DelGeorge letter to D. G. Eisenhut
dated July 2, 1981.

Dear Mr. Eisenhut:

Reference (a) committed the Commonwealth Edison Company to provide, within sixty (60) days, a response to NUREG 0737 Items II.K.3.29 and III.D.3.4. The enclosure to this letter fulfills this commitment.

In response to Item III.D.3.4, we are providing partial reports of the ongoing control room habitability studies for our Dresden and Quad Cities Stations. These reports provide only preliminary information regarding the survey of potential on-site and off-site sources of toxic chemicals and identify that this is an ongoing effort. We are also providing the Zion Station final report that evaluates control room habitability under accident conditions.

In response to Item II.K.3.29, we are providing the results of our evaluation performed to resolve the isolation condenser issue for our Dresden Station.

To the best of my knowledge and belief, the statements contained herein and in the enclosure are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees and consultants. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

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September 1, 1981

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

One (1) signed original and seventy-nine (79) copies of this letter are provided for your use. Due to the voluminous nature of the enclosed reports, only seven (7) copies of these documents are being provided.

Very truly yours,



L. O. DelGeorge
Director of Nuclear Licensing

Enclosure

cc: J. Keppler, Director
Region III Inspector - Dresden
Region III Inspector - Quad Cities
Region III Inspector - Zion

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

RESPONSES TO NUREG 0737 ITEMS II.K.3.29 and III.D.3.4
REQUIRING A SEPTEMBER 1, 1981, SUBMITTAL

II.K.3.29 - Study to Demonstrate Performance of
Isolation Condensers with Noncondensibles

Dresden Station Response

See prior response in Reference (a). The original requirement of this item requested that a study be performed to determine the effects on natural circulation of various modes of two-phase flow which may play a significant role in plant response following a small break loss-of-coolant accident. We have based our evaluation of this item on the fact that the isolation condenser does not perform a LOCA function.

The isolation condenser system is an auxiliary reactor coolant system which provides for core cooling in the event that the main condenser becomes isolated from the reactor vessel. Basically, the system is used to handle normal operating transients. It has undergone such transients in the past with the system performing satisfactorily during recovery periods.

Also referring to the Dresden 2 and 3 FSAR, the isolation condenser system is not one of the emergency core cooling systems used to mitigate the consequences of a LOCA. The HPCI system and the Automatic Depressurization system (which acts as a backup to HPCI) are listed as those providing for core cooling during the small break LOCA. These systems are integrated into the plant analyses which determine the LOCA response. At no time in these analyses is credit assumed for isolation condenser operation.

Based upon the above considerations, it is our position that the study requested by NUREG 0737, Item II.K.3.29 should not be required for our Dresden Station. In our judgement, no further response is required.

Enclosure

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III.D.3.4 - Control Room Habitability Requirements

Dresden, Quad Cities and Zion Station Responses

See prior response in Reference (a). Enclosed for your use are seven (7) copies each of the Dresden and Quad Cities Station partial reports on control room habitability and the final report for Zion Station evaluating control room habitability under accident conditions.

We understand that since the TMI-2 accident, iodine source terms have come under close scrutiny and that the NRC is presently re-examining the appropriateness of the source term assumptions. The Commonwealth Edison Company reserves the right to reconsider its commitments made regarding this item, should the presently used overly conservative assumptions about iodine source terms be relaxed by the NRC. Should any commitment changes become desirable, the Commonwealth Edison Company will promptly notify the NRC.

Our current schedule for completion of this review effort is January 1, 1982. However, any recommended design modifications that results from this review effort will not be implemented until the NRC has completed their review.

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