



**Commonwealth Edison**  
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Chicago, Illinois 60690

November 20, 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  
Status of NUREG 0737, Items  
II.F.1.1 and II.F.1.2  
NRC Docket Nos. 50-237/249 and  
50-254/265

- Reference (a): J. S. Abel letter to D. G. Eisenhut  
dated December 31, 1980.
- (b): D. M. Crutchfield letter to L. DelGeorge  
dated October 20, 1981.

Dear Mr. Eisenhut:

Reference (b) requested the Commonwealth Edison Company to provide formal notification, within thirty (30) days, if our Dresden Station Unit 2 designs for NUREG 0737 Items II.F.1.1 and II.F.1.2 will technically deviate from stated NRC positions.

Our Reference (a) submittal stated that we did not expect to deviate from the NUREG 0737 Item II.F.1.1 position regarding the noble gas effluent monitor for our Dresden and Quad Cities Stations. However, we did state that changes to the requirements of Item II.F.1.2 were still under review regarding the sampling and analysis of plant effluents. If deviations in our designs were found to exist from the NUREG 0737 position, we stated that the necessary information would be provided.

Based upon the Reference (b) request, we have re-reviewed our Dresden and Quad Cities Station designs and intended actions. Subject to our interpretations of the requirements, we do not intend to technically deviate from the NUREG 0737 positions for Items II.F.1.1 and II.F.1.2.

Every effort has been made in order to accommodate the required January 1, 1982, implementation date. This objective will be met for Item II.F.1.1. However, total compliance with the NUREG 0737 Item II.F.1.2 requirements cannot be met until fourth quarter, 1982.

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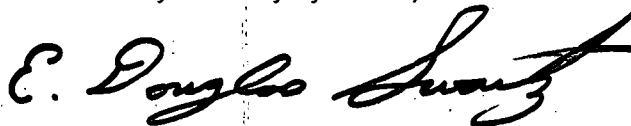
The enclosure to this letter provides the current status of our installations. Although accident range particulate and iodine filters cannot be installed until the fourth quarter, 1982, normal range filter equipment will be operational by January 1, 1982. Based upon the explanation and justification provided in the enclosure, we hereby request Commission approval to delay the implementation date of the required five rem exposure limit to personnel during the accident period until the fourth quarter, 1982.

Please be advised that the Commonwealth Edison Company is currently reviewing the status of the NUREG 0737 required installations at our operating stations, in order to assess our ability to comply with all implementation dates. Upon completion of this effort, we will advise the Commission of any unforeseen schedule delays.

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

One (1) signed original and fifty-nine (59) copies of this letter are provided for your use.

Very truly yours,



E. Douglas Swartz  
Nuclear Licensing Administrator

cc: D. M. Crutchfield - ORB #5  
J. G. Keppler - Director RIII  
M. P. Phillips - RIII  
Region III Inspector - Dresden  
Region III Inspector - Quad Cities

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

DRESDEN STATION UNITS 1 and 2

QUAD CITIES STATION UNITS 1 and 2

UPDATED STATUS OF NUREG 0737 ITEMS II.F.1.1 and II.F.1.2

II.F.1.1 - Noble Gas Effluent Monitor

II.F.1.2 - Sampling and Analysis of Plant Effluent

In order to meet the original NUREG 0578 requirements, Commonwealth Edison purchased Eberline SPING-4 High Range Noble Gas Monitors. At Dresden Station, these were installed on the Unit 2/3 Main Chimney, Unit 2/3 Reactor Building Vent Stack and on the Unit 1 Chimney. At Quad Cities Station, these were installed on the Main Chimney and the Reactor Building Vent Stack. These monitors incorporate three noble gas monitoring channels (low, medium and high), and particulate and iodine filters onto one skid. The monitors are capable of measuring noble gas concentrations from  $10^{-7}$   $\mu$ Ci/cc to  $10^{+5}$   $\mu$ Ci/cc. The system also has background subtraction and recording in the main control room. In addition, several vents previously venting to atmosphere were combined into one system which now vent to a single monitored release point.

The above described system met the TMI Short Term Lessons Learned requirements until NUREG 0737 was issued which imposed the five rem exposure limit to personnel during the accident period. Personnel exposure would be above this limit with the present filters under accident conditions. In order to comply with the exposure limit requirements, Commonwealth Edison intends to install an accident range particulate and iodine system as manufactured by Victoreen, to replace the existing SPING-4 filters on the Dresden Station Unit 2/3 and Quad Cities Station Main Chimneys in the event of an accident release. Figure I provides a simplified schematic of this concept. Modifications are not planned on the reactor building vent stacks at either station because they isolate during an accident. Additionally, no modifications will be made to the Dresden Unit 1 Chimney because the unit is not in operation.

This Victoreen equipment meets the NUREG 0737 exposure limit requirements and utilizes redundant and shielded particulate and

Enclosure

- 2 -

iodine filters. The equipment is designed such that one train can be collecting samples while the other train is being counted in the laboratory. After filtering, the effluent will be monitored by a high range noble gas channel. The filter assembly has a portable 80 pound bucket which is shielded with a 2-1/2 inches of lead.

The current schedule for delivery of the Victoreen equipment is August, 1982. Additionally, it is estimated to take approximately four (4) months to install this equipment. Although the accident range particulate and iodine filters cannot be made operational until the fourth quarter, 1982, the SPING-4 equipment will be functioning.

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FIGURE I

