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August 18, 1981

Mr. James G. Keppler, Director
 Directorate of Inspection and
 Enforcement - Region III
 U.S. Nuclear Regulatory Commission
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
 Quad Cities Station Units 1 and 2
 Response to NRC Questions
 Concerning Control Rod Drive
 Insert and Withdraw Line
 Seismic Operability
 NRC Docket Nos. 50-237/245 and
 50-254/265

Dear Mr. Keppler:

The Dresden Units 2 and 3 and Quad Cities Units 1 and 2 Control Rod Drive System insert and withdrawal line operability has been the subject of several meetings with the NRC Staff in Bethesda. In the most recent meeting of June 30, 1981, Commonwealth Edison committed to respond to four questions. The questions, with our responses, follow:

- 1) Provide The Results Of The Dresden Unit 3 As-Built Analysis - The system is similar to Unit 2 in pipe configuration and hanger design however, hanger location is different. Therefore, a unique analysis was performed for Unit 3. The results were similar to Unit 2, as expected. The pipe stress was well below operability limits and the hanger loads were comparable to Unit 2. The conclusion is that Unit 3 is operable based on the same arguments as Unit 2.
- 2) Compare Absolute Sum Method and SRSS Method Of Combining Earthquake Loads - The results of this comparison were a wide variation of pipe stress, from -3% (decrease) to +15% (increase) using SRSS compared to Absolute Sum. The support loads, in general, tended to decrease. These loads change from -30% (decrease) to +4% (increase).

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- 3) Compare 2% To 3% SSE Spectral Damping For Quad Cities - At 2% damping, hanger loads increase by 10%, when compared to 3% damping loads however, piping stresses are still well below operability stress. This 10% increase in hanger load increased the number of hangers which did not meet operability from 2 to 8. As demonstrated by the analyses presented at the June 30 meeting, however, 8 yielding supports in this system of 63 hangers does not impair functionality.
- 4) Provide A More Expeditious Schedule For Installation Of Modifications - To improve our schedule for modification installation, EDS has increased staffing on CRD work and decreased personnel working on 79-14. This has made designs available sooner to allow installation to proceed. The schedule for Dresden is:

Dresden Unit 2:

- 1) Inside Drywell is complete
- 2) Outside Drywell will be complete by December 31, 1981. This is an improvement of 12 weeks over the original schedule.

Dresden Unit 3:

All modifications (inside and outside the drywell) will be complete by the end of the upcoming refueling outage, May, 1982. This is an improvement of 16 weeks over the original schedule.

EAS is limited in manpower, however, they have begun working significant overtime to produce hanger designs. The schedule for modifications for Quad Cities is:

Quad Cities Unit 1:

- 1) Inside Drywell - All modifications will be completed by the end of the upcoming refueling outage, ending in November, 1982.
- 2) Outside Drywell - All modifications will be complete by March, 1982, an improvement of 20 weeks over the original schedule.

Quad Cities Unit 2:

All modifications (inside and outside the drywell) will be complete by the end of the upcoming refueling outage, December, 1981. This is an improvement of 24 weeks over the original schedule.

This closes out all the open items from the meetings on CRD operability. Please contact us should there be any questions.

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

Very truly yours,



Thomas J. Rausch
Nuclear Licensing Administrator
Boiling Water Reactors

cc: Region III Inspector - Dresden
Region III Inspector - Quad Cities
D. Danielson - Region III
J. Fair - NRC/I.E.

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