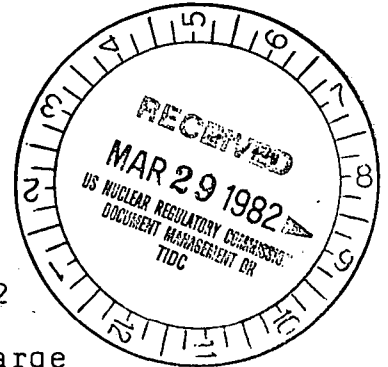




Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

March 16, 1982

Mr. Harold R. Denton, Director
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555



Subject: Dresden Station Units 2 and 3
 Quad Cities Station Units 1 and 2
 Implementation of Long Term
 Modifications to the Scram Discharge
 Volume (SDV)
NRC Docket Nos. 50-237/249 & 50-254/265

Reference (a): R. F. Janecek letter to D. Eisenhut
 dated January 15, 1981.

Dear Mr. Denton:

In Reference (a), Commonwealth Edison Company provided a commitment to implement long term modifications to the Dresden Station Units 2 and 3 and Quad Cities Station Units 1 and 2 scram discharge systems that would satisfy the BWR Owners subgroup criteria. At that time, we indicated that we intended to complete these modifications during the first refueling outage commencing after January 1, 1982, for each unit.

This modification work is in progress at Dresden Station on Unit 3 and is scheduled for completion by March 28, 1982. Original cost estimates for this modification work were approximately \$1,000,000 per unit. The current expected cost for this work at Dresden Unit 3 alone will exceed \$2,500,000.

Due to the excessive cost of this modification work and our current severe budgetary constraints, it is imperative that we defer implementation of this modification on the remaining three units until the first unit refueling outage commencing after September 1, 1984. Under this schedule, modification work would be completed by approximately January 1, 1986.

A safety review of the existing systems at each station has been conducted and in our judgement continued operation is more than justified for the reasons listed below:

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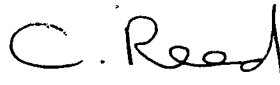
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- 1) Station personnel performed Scram Discharge Volume (SDV) drain tests on all operating units demonstrating that the SDV will drain acceptably after reactor scram.
- 2) All SDV ventilation piping has been checked and modified where necessary to ensure positive SDV venting providing added insurance that water will not accumulate in the SDV.
- 3) Continuous ultrasonic water monitoring systems have been installed on all remaining units providing increased assurance that adequate volume for the scram discharge water will always be available.
- 4) Functional tests of the instrument volume level instrumentation are required after every scram substantially reducing the probability that damaged instrumentation would remain undetected during subsequent plant operation.
- 5) Station personnel have reviewed and verified the shutdown procedures to be taken in the event that the SDV filled with water or in the event that another potential scram failure occurred.

If you have any questions or comments concerning this matter, please contact me.

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

Very truly yours,


Cordell Reed
Vice-President

lm

cc: J. G. Keppler (Region III)
Region III Inspector - Dresden
Region III Inspector Quad Cities

3632N