



**Commonwealth Edison**  
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Address Reply to: Post Office Box 767  
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June 4, 1982

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  
LaSalle County Station Unit 1  
Response to Generic Letter 82-10  
Concerning Various NUREG 0737 Items  
NRC Docket Nos. 50-237/249,  
50-254/265, 50-295/304 and 50-373

- Reference (a): J. S. Abel letter to D. G. Eisenhut dated December 15, 1980.
- (b): J. S. Abel letter to D. G. Eisenhut dated April 10, 1981.
- (c): J. S. Abel letter to D. G. Eisenhut dated June 1, 1981.
- (d): L. O. DelGeorge letter to D. G. Eisenhut dated September 1, 1981.
- (e): E. D. Swartz letter to D. G. Eisenhut dated December 17, 1981.
- (f): E. D. Swartz letter to D. G. Eisenhut dated January 8, 1982.
- (g): C. W. Schroeder letter to A. Schwencer dated March 9, 1982.
- (h): E. D. Swartz letter to D. G. Eisenhut dated March 31, 1982.
- (i): E. D. Swartz letter to D. G. Eisenhut dated April 27, 1982.
- (j): D. G. Eisenhut letter to All Licensees dated May 5, 1982.

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Dear Mr. Eisenhut:

Reference (j) required that the Commonwealth Edison Company provide, within thirty (30) days, information concerning the implementation status of various NUREG 0737 items. Specifically, for those applicable items in the Enclosure that have been completed, we were requested to confirm their completion and

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NRC Commitment or Requirement:

<u>Due Date</u>	<u>Commitment or Requirement</u>	<u>Responsible Edison Department</u>
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Note: Because Confirmatory Orders will be issued based upon our commitments stated in the above referenced letter, please ensure that these commitments are met. These commitments will be tracked on the NUREG 0737 open item monthly status report.

When it is determined by the responsible department that a due date will not be met, the Nuclear Licensing Administrator should be notified immediately.

  
E. D. Swartz 82-110

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document the date on which they were completed. For those applicable items in the Enclosure that have not been completed, we were requested to propose a firm specific schedule for implementation, along with our justification and demonstration of need for such a proposed schedule and a description of compensatory measures being taken in the interim.

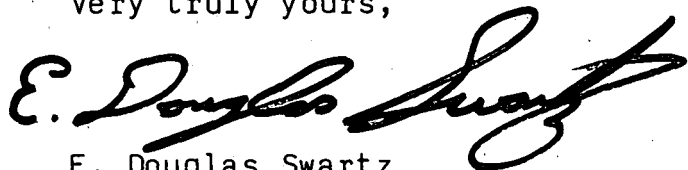
The attachment to this letter provides the requested information for our Dresden, Quad Cities, and Zion Stations, and also our LaSalle County Station Unit 1.

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

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

One (1) signed original and ninety-nine (99) copies of this letter with attachment are provided for your use.

Very truly yours,



E. Douglas Swartz  
Nuclear Licensing Administrator

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Attachments

- cc: J. G. Keppler - Region III
- Region III Inspector - Dresden
- Region III Inspector - Quad Cities
- Region III Inspector Zion
- Region III Inspector - LaSalle

SUBSCRIBED AND SWORN to  
before me this 4th day  
of June, 1982.

  
Notary Public

ATTACHMENT

COMMONWEALTH EDISON COMPANY

Dresden Station Units 2 and 3

Quad Cities Station Units 1 and 2

Zion Station Units 1 and 2

LaSalle County Station Unit 1

Response to Generic Letter No. 82-10 concerning the  
implementation status of various NUREG 0737 Items.

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### I.A.1.3.1 Limit Overtime

#### Dresden Response

We are in substantial compliance with both the NUREG 0737 and Generic Letter 82-02 requirements. The subject overtime limitation for the Shift Engineer, Shift Foreman, Station Control Room Engineer and the Nuclear Station Operator is administratively covered by procedure. For the additional job classifications identified in the NUREG and Generic Letter, Dresden maintains a sufficient number of personnel such that overtime, even for extended outages, is not routinely scheduled to extend beyond a 12 hour shift. Per the November 10, 1981 letter from T. A. Ippolito to L. DelGeorge, the NRC Staff has found that our previous correspondence adequately addresses the shift manning overtime limit requirements. This item is considered complete.

#### Quad Cities Response

Per the March 23, 1982 letter from D. B. Vassallo to L. O. DelGeorge, the NRC Staff has found our response to this item to be acceptable. This item is considered complete.

#### LaSalle Unit 1 Response

LaSalle County Station complies with the overtime requirements of Generic Letter 82-02. These requirements are incorporated into the plant Technical Specifications, which have been in effect since April 17, 1982.

#### Zion Response

It is Zion Station's policy to maintain an adequate number of personnel on the Station payroll in the Shift Engineer, Shift Foreman, Station Control Room Engineer, Nuclear Station Operator, Equipment Operator, and Equipment Attendant job classifications such that the use of overtime is not routinely required to compensate for inadequate staffing. Zion Administrative Procedure 10-52-3, "Shift Manning, Relief, and Turnover" is being revised to endorse the overtime guidelines as stated in Generic Letter No. 82-02, dated February 8, 1982 for these plant positions. This procedure change will be completed by August 1, 1982. Zion Administrative Procedure 10-52-3 will also stipulate that work schedules for Operating shift personnel be established in advance to ensure that the potential for exceeding the overtime guidelines is minimized when filling the minimum shift manning requirements.

It is understood that vacancies due to promotion, resignation, extended illnesses, or other uncontrollable factors may create situations requiring overtime outside these guidelines. The Assistant Superintendent of Operations shall document the reasons necessary for such overtime including the corrective action being taken to restore desired manning levels and receive written approval of the Station Superintendent for instances where overtime is necessary for extended periods.

Also, it is understood that there may be short term requirements for exceeding the above guidelines due to unexpected illness, unusual Unit conditions, etc. The Shift Engineer shall cover vacancies in accordance with the overtime rules of the Collective Bargaining Agreement and existing Station guidelines. Those instances which require deviation from the above overtime limitation guidelines shall be documented and reviewed by the Station Superintendent or his designee as soon as practicable following the occurrence. Further, such variances shall be documented and periodically forwarded to the Operations Manager, Nuclear Stations Division, for General Office information.

Zion Administrative Procedure 10-52-3 presently allows, for short periods of time, the option that one of the three Nuclear Station Operators may be relieved by another licensed individual to leave the control room, with the prior approval of the Shift Control Room Engineer. This approach is in agreement with the intent of Generic Letter No. 82-02.

Summarizing, Zion Station, in practice, presently meets the overtime guidelines of Generic Letter No. 82-02. The procedure change to ZAP 10-52-3, which will administratively implement these overtime guidelines, will be completed by August 1, 1982. It should be noted that per a January 12, 1982 letter from S. Varga to L. O. DelGeorge, the NRC Staff acknowledged that our previous commitment to this item was acceptable. We believe that incorporation of the revised overtime guidelines of Generic Letter No. 82-02 into our administrative procedures will also be acceptable.

### I.A.1.3.2 Minimum Shift Crew

#### Dresden Response

The minimum levels of shift staffing as set forth on pages 3-9 of NUREG 0737 are incorporated in Dresden's existing Technical Specifications. The inclusion of a Shift Control Room Engineer on each shift was established by June 1, 1981. This item is considered complete.

#### Quad Cities Response

Reference (i) outlined the SCRE personnel shortfalls and our inability to be able to meet the requirements for an SRO in the Control Room for all shifts by July 1, 1982 and requested NRC approval for a delay in the implementation of this item. In our judgment, our Reference (i) letter included appropriate justification and need for the new schedule, as well as interim measures.

#### Zion Response

Zion Station, in practice, presently meets the Minimum Shift Crew requirements of NUREG 0737 Item I.A.1.3.2. Zion is in complete accordance with these requirements with the following exceptions:

1. Pertaining to the minimum levels set forth on page 3-9, Zion administratively maintains adequate shift manning to meet these requirements. The present Zion Tech Specs could, however, allow operation below these staffing requirements. In particular, with one unit operating, Zion Tech Specs presently state that a minimum of 2 RO's are required, whereas 3 RO's are required per NUREG 0737. In addition, with both units shutdown, Zion's Tech Specs presently state that a minimum of 1 RO and 2 AOs are required; whereas 2 RO's and 3 AO's are required per NUREG 0737. Adherence to administrative procedures will ensure that minimum shift manning requirements of NUREG 0737 are met.
2. The minimum shift crew presently required by Zion Tech Specs for the case of one unit operating or both units operating, can be reduced by one in the case of a shift shortage caused by a sudden sickness or home emergency. Although instances of this nature are a rare occurrence, such a stipulation is felt necessary during these instances.

#### LaSalle Unit 1 Response

LaSalle County Station currently complies with the manning requirements set forth on page 3-9 of NUREG 0737. These requirements are incorporated into the plant Technical Specifications, which have been in effect since April 17, 1982.

## I.C.1 Revise Emergency Procedures

### Dresden and Quad Cities Response

This item requires the preparation of guidelines and emergency procedures for response to plant transients and accidents. Additional guidance on this topic indicates the need to prepare generic and specific writers guides and training guides for procedures preparation and operator training. In addition, the generic Emergency Procedure Guidelines (EPG's) require additional technical analysis to make them plant-specific for use at individual stations.

Since the EPGs require pre-implementation review and approval by the NRC prior to their use, final procedures preparation and training cannot be completed until approved EPGs are available. Based on the extensive amount of preparatory work identified above, we believe that implementation of emergency procedures based on the EPGs will require about 18 months after NRC approval of the EPGs is received. Depending upon the timeliness of the NRC Staff review, implementation could be in early 1984.

In our judgment, this schedule will adequately allow for our Station Nuclear Engineering Department to provide the site-specific design limit numbers for the guidelines and procedures, as well as for the Stations to write, approve, implement and train operators on the new procedures. In the interim, the currently existing DGA and DOA procedures at Dresden Station and the currently existing QGA and QOA procedures at Quad Cities Station are considered to be adequate. However, should the NRC Staff issuance of SECY 82-111 "Requirements for Emergency Response Capability" conflict with our program or schedule as stated above, the Commonwealth Edison Company reserves the right to reconsider our commitments to same.

### Zion Response

Commonwealth Edison is committed to addressing this item through our participation in the Westinghouse Owners Group procedures development program. The details of this program and reports of its progress have been presented to the NRC Staff in previous Owners Group correspondence and presentations. Although the schedule for revised emergency procedures promulgated in NUREG 0737 required implementation by the first refueling outage after 1-01-82 (and now extended to first refueling outage after 10-01-82 by issuance of Generic Letter No. 82-10), we understand that the Commissioners are presently considering a revised implementation schedule for this item under the topic of SECY 82-111, "Requirements for Emergency Response Capabilities." This paper advocates the integration of the development of the Safety Parameter Display, the Control Room Design Review, and the Emergency Operating Procedures, and recommends that the implementation schedules for these items be appropriately coordinated. Commonwealth Edison endorses this position. Therefore, we will respond to the NRC Staff's request for a plant-specific implementation schedule for emergency operating procedures following the Commission's actions on SECY 82-111 and the issuance of a revised suggested implementation schedule.



LaSalle Unit 1 Response

LaSalle County Station has implemented the revised emergency procedures. NRC acceptance of the revised procedures is documented in OIE Inspection Report 50/373-82-12 dated March 12, 1982.

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I.D.1  
I.D.2  
II.B.1  
II.B.2.3  
II.F.2

Dresden, Quad cities, Zion and LaSalle Unit 1 Response

No response requested.

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II.D.1.2 RV and SV Test Programs

Zion Response

Reference (h) provided our preliminary assessments of the RV and SV operability in accordance with the April 1, 1982, requirement date. This item is complete. Concerning the plant specific reports, this item will be completed by the recommended July 1, 1982, schedule date and will be documented in our submittal at that time.

Dresden, Quad Cities and LaSalle Unit 1 Response

No response requested

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II.D.1.3 Block Valve Testing

Zion Response

This item will be completed by the recommended July 1, 1982 schedule date and will be documented in our submittal at that time.

Dresden, Quad Cities and LaSalle Unit 1 Response

No response requested

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## II.K.3.18 Modifications of ADS Logic

### Dresden and Quad Cities Response

Reference (h) provided our response to this item which endorsed the BWR Owners Group position and indicated our estimation that at least three (3) months will be required for our review of the final BWR Owners Group supplemental report before proposed modifications can be identified. The D. G. Eisenhut letter to T. J. Dente dated April 23, 1982, provide NRC acceptance of the BWR Owners Group position and schedule delay until September 30, 1982.

### Zion Response

This item is not applicable to PWRs.

### LaSalle Unit 1 Response

See FSAR Amendment 56 (May 1981), Appendix L.62 of LaSalle FSAR for (first submittal). The first submittal on this item included the BWR Owner's Group evaluation of the feasibility and benefits of extending the operation of ADS to include transient events which do not result in release of steam to the drywell. The intent was to provide assurance of ADS operation, beyond the manual activation of ADS, for isolation events (transients) not accompanied by a high drywell pressure signal (accompanied by loss of HPCS injection). The conclusion was that present LSCS equipment, along with the Emergency Procedure Guidelines, was entirely adequate; that adequate manual operating time interval exists; but that a bypass of the high drywell pressure signal in the ADS logic would allow automatic ADS responses for the transients of interest without undue complexity.

See Reference (g) and FSAR Amendment 61 (May, 1982), Appendix L.62 of LaSalle FSAR for (second submittal). The second submittal on this item included an informational letter transmittal in outlining the complexity of the ADS logic inhibit previously presented when viewed in the context of hypothesized ATWS events. The BWR Owner's Group had modified the earlier recommendation on bypass of high drywell pressure signal because ADS inhibit is mandatory during certain ATWS events and because boron mixing efficiency is poor thus creating a potential thermal problem with the suppression pool and containment. This complexity was explained in the second submittal and an interim position made that resolution of ADS diversity should be in the context of ADS and not in the context of ATWS. (FSAR Amendment 61 formalized this position).

II.K.3.30 Small Break LOCA Methods and Analysis  
and  
II.K.3.31

Dresden and Quad Cities Response

Reference (f) provided our response to these items and stated our belief that all NRC concerns have been addressed and that no additional response is required. Until such time as we receive a response from the NRC Staff concerning this issue, we believe this item to be complete.

Zion Response

Reference (h) discussed the Westinghouse submittal of WCAP 10,054 "Small-Break LOCA Analysis Model" (draft copy). We understand that some initial questions from the NRC Staff have been received by Westinghouse and are currently being addressed. Upon our receipt of final NRC Staff approval of the Westinghouse position, we anticipate a one (1) year schedule will be necessary to provide modifications or analyses, as required.

LaSalle Unit 1 Response

See the FSAR Amendment 60 (March 1982), Appendix L.69 and L.70 of LaSalle FSAR. The LOCA analysis for LaSalle includes coverage for small breaks both inside and outside primary containment. Coverage extends across breaks with sizes from 4 square feet to 0.02 square feet. Methodology for analysis according to Appendix K requirements is documented in the references listed in Section 6.3.6 of the FSAR. ECCS analytical codes and calculational procedures are enumerated in Section 6.3.3.7. Conformance to the most recent NRC methods and acceptance criteria is demonstrated to 10CFR50.46 standards.

Reference the GE Presentation for BWR Owner's Group to NRC staff on June 18, 1981 and transmittal of presentation materials from GE's Buckholz to NRC's Eisenhut on June 26, 1981. The Generic Meeting called by W. Hodges (NRC) to closeout NUREG 0737 Item II.K.3.30 included GE's presentation of test results from TLTA small break test series and discussion of the sensitivity studies by GE for BWR small break LOCA analysis model. That break model already satisfies the concerns of NUREG 0626 and is in compliance with 10CFR50.46 Appendix K. The summary conclusion from this meeting was that the GE small break model is acceptable relative to the concerns of Item II.K.3.30 and that no model changes are needed. NEDO-20566 and addenda document these facts and methods as discussed in the June 18 closeout meeting. Therefore, it is concluded that no changes are needed in the LaSalle ECCS analysis of small break LOCA's. The LaSalle FSAR results in Section 6.3.37 and Table 6.3-8 along with the references to Section 6.3.6 in the FSAR show conformance to the approved Appendix K methodology.

### III.A.1.2 Staffing Levels for Emergency Situations

#### Dresden, Quad Cities, Zion and LaSalle Unit 1 Response

This item is complete. Revision 3 of the Commonwealth Edison Company Generating Station Emergency Plan (GSEP) was formally approved in-house (on-site and off-site) on February 1, 1982, and includes requirements for minimum shift manning and a description of the methodology used, including periodic drills, to meet the shift augmentation guidance of NUREG-0654.

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### III.A.1.2 Upgrade Emergency Support Facilities

#### Dresden, Quad Cities, Zion and LaSalle Unit 1 Response

The Commonwealth Edison Company reviewed the post TMI requirements for TSCs, EOFs and SPDSs as they were issued by the NRC Staff. We have attempted to understand and make a good faith effort in meeting these schedules and requirements. In order to do so, we committed our resources early and proceeded with design, procurement and construction based on the preliminary Staff criteria. It should be noted that Commonwealth Edison established interim TSCs and EOFs for each of our operating plants. These interim facilities have been used during our GSEP drills and have performed satisfactorily.

The Commonwealth Edison projected schedule for completion of the ERFs is provided in the table below. Explanations follow to justify delays from the October 1, 1982 requirement date.

<u>Unit</u>	<u>SPDS</u>	<u>Permanent TSC</u>	<u>Permanent EOF</u>
Zion	10/1/82	10/1/82, 12/31/82(3)	12/31/82
Quad Cities	(1)	10/1/82, (1)(2)(3)	10/1/82, (1)(2)(3)
Dresden	7/1/83	10/1/82, 7/1/83(2)(3)	10/1/82, 7/1/83(2)(3)
LaSalle 1	10/1/82	10/1/82	10/1/82
LaSalle 2	Will be addressed in the OL review process		
Byron	Will be addressed in the OL review process		
Braidwood	Will be addressed in the OL review process		

(1) One month after the completion of the refueling outage currently scheduled for the Fall of 1983.  
(2) Operational date for SPDS within that location.  
(3) Historical data available within that location.

The above schedules represent the best effort that we can currently project. These schedules are based on vendor information as to when each vendor will be performing their scope of the project. Although all critical path equipment and services have been contracted for, unanticipated delays in the manufacture or delivery of equipment, or labor strikes could necessitate delays in the above dates. (We intend to have the upgraded ERFs operational for LaSalle Unit 2 and Byron and Braidwood Units 1 & 2 prior to receiving their respective operating licenses.)

In 1979, the Commonwealth Edison Company began studying computer designs which utilized a central process computer for a central data base in order to meet our needs for control room improvements, TSCs and EOFs. It was our original goal to develop a standard design for our BWRs and a standard design for our PWRs.



Using this philosophy and projecting what we believed was reasonable that would meet our requirements, we proceeded with a computer changeout program at Zion, Quad Cities and Dresden Stations. The Zion process computer changeout has been completed. The Dresden and Quad Cities changeouts will occur during their Spring 1983 and Fall 1983 refueling outages respectively.

The Dresden computer changeout is proceeding as originally scheduled. The computers are currently in our computer laboratory being programmed and tested. The new Quad Cities process computers are at Quad Cities. However, as more detailed information became available as to the amount of work required for the computer changeout and the extreme tightness of the original schedule, it became apparent that performing the computer changeout during the Fall 1982 outage as originally planned would add significantly to the outage duration. As a result, a decision was made to perform the changeout during the next scheduled refueling outage in the Fall, 1983 as stated above.

The date shown for the TSCs and the EOFs include completion of the buildings, communications, records, meteorological and radiological information on all units. For Zion and LaSalle Unit 1, real time data as provided by the process computers to the SPDSs will be available in the TSCs by October 1, 1982. SPDS information will be available by July 1, 1983 for Dresden. The Quad Cities SPDS information will be available one month after completion of the Fall 1983 refueling outage. It is currently expected that the historical data requirements will be provided to the TSC and EOF by October 1, 1982 for LaSalle Unit 1, by December 31, 1982 for Zion, by July 1, 1983 for Dresden and approximately by December 31, 1983 for Quad Cities.

Commonwealth Edison is currently performing preliminary engineering in order to determine the scope of the work required to comply with the intent of Reg. Guide 1.97. We expect that this effort will allow us to develop a complete project scope of work and schedule for submittal to the Staff by December 31, 1982 for Dresden, Quad Cities and Zion. We expect to provide the LaSalle Unit 1 action plan for addressing Reg. Guide 1.97 by July 1, 1982.

Again, we must emphasize that the schedule dates set forth above are best effort dates that we can project and are based upon extremely tight schedules and are subject to vendor promises to perform. Therefore, our proposed schedules have an extreme propensity towards slippages due to causes beyond the control of the Commonwealth Edison Company. Should schedular difficulties arise, the NRC Staff will be promptly notified. Finally, should the NRC Staff issuance of SECY-82-111 "Requirements for Emergency Response Capability" conflict with our commitments to design or schedule as stated above, the Commonwealth Edison Company reserves the right to reconsider our commitments to same.

### III.A.2.2 Meteorological Data

#### Dresden, Quad-Cities, Zion and LaSalle Unit 1 Response

##### Milestone (4) Installation of ERF meteorological Hardware and Software.

As of October 1, 1981, the Dresden, Quad-Cities and Zion Stations TSCs and interim EOFs have computer hardware in the form of scope and printer and/or printer/terminals capable of accessing the company's Offsite Dose Calculation System (ODCS). As of March 15, 1982, the LaSalle Station also had these capabilities as well as an A-Model program accessible from the TSC and the control room.

The details of the ODCS Programs were given in a report submitted to the NRC on the Zion Station Docket in August, 1980, and which was resubmitted on the LaSalle Station docket in April, 1982. A comparison of the Commonwealth Edison and NRC models was made in Reference (a).

Further information on the planned implementation of an A-model of the Dresden, Quad-Cities and Zion Stations, was given in References (b) and (c). The primary issue governing scheduling of this task was installation of additional computer hardware.

The same capabilities related to the ODCS that exist in the interim EOFs will be available in the final EOFs upon their completion. (Refer to item III A.2.1.) Additionally, the A-Model will be available in the final EOFs.

##### Milestone (5) Full Implementation of Milestone (4)

Full implementation of milestone (4) will be achieved when the A-model is operational at the Dresden, Quad Cities and Zion Stations.

The schedule for completing the installation of the A-Model is contingent on computer modifications occurring at each site, which are restricted by availability of hardware, scheduled maintenance outages and required associated modifications to supply the required building space and support utilities.

The Dresden Station process computer installation is currently planned during the Unit #2 refueling outage scheduled to begin in January, 1983. Operation of the A-Model is expected by June, 1983.

The Quad-Cities Station process computer installation is currently planned during the Unit #2 refueling outage scheduled to begin in September, 1983. An operational A-Model is expected by February, 1984.

The Zion Station Prime computer installation is currently in progress. An operational A-Model is expected upon completion of the final nearsite EOF facility, by January 1, 1983.

In the interim, the current B-Model and C-Model options of the ODCS can be utilized to compensate for the required dose assessment capabilities.

Milestone (6) Manadatory Review of the DCM by the Licensee

The revised ODCS Report submitted in April, 1982 reflects the results of the company's review of the DCM. This item is complete.

Milestone (7) Description of Class B-Model provided to the NRC

A description of the Class B-Model is contained in the April, 1982 ODCS.

Milestone (8) Full Operation of the Class B-Model

The Class B-Model is operational now thus will be operational by the recommended June 1, 1983 date identified in NUREG-0654 and NUREG-0737.

### III.D.3.4 Control Room Habitability

#### Dresden, Quad Cities and Zion Response

NUREG 0737 required that the Licensee propose a schedule for completion of the modifications identified to be required as a result of each control-room habitability study. In addition, the implementation of such modifications was to begin without awaiting the results of the NRC Staff review.

References (d) and (e) provided the final control room habitability studies and proposed modifications with a schedule for completion by January 1, 1984. Accordingly, the Commonwealth Edison Company is proceeding with the design of these modifications without Staff concurrence to allow for our scheduled January 1, 1984, completion date.

However, if the NRC Staff review of these studies result in changes or additional modifications being requested, then the implementation date of such additional changes or modifications will be the subject of future correspondence and will most likely not be implemented on our January 1, 1984, schedule for completion.

Additionally, as stated in References (d) and (e), we understand that the NRC Staff is presently re-examining the appropriateness of their source-term assumptions. Should the presently required overly conservative assumptions concerning the iodine source terms be relaxed by the NRC Staff, then the Commonwealth Edison Company reserves the right to reconsider our commitments to provide (or maintain) the modifications described above. Should any such changes become desirable, we will promptly notify the NRC Staff.

#### LaSalle Unit 1 Response

The NUREG 0519 Safety Evaluation Report dated March, 1981, addressed this issue in Section 6.4. No facility modifications were deemed necessary.