



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

July 8, 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
NUREG 0737 Item II.B.3
Post Accident Sampling System
NRC Docket Nos. 50-237/249,
50-254/265 and 50-295/304

Reference (a): S. A. Varga letter to L. O. DelGeorge
dated April 1, 1982

Dear Mr. Eisenhut:

Reference (a) requested that the Commonwealth Edison Company provide, within ninety (90) days of receipt, certain documentation concerning the Item II.B.3 Post Accident Sampling System at our Zion Station.

As you are aware, NUREG 0737 provided many clarifications to the requirements of this Item II.B.3 and set forth the documentation requirements that would allow for NRC Staff review of Licensee final design details. Accordingly, the Commonwealth Edison Company provided various commitments to this item.

Reference (a) now provides "further clarifications" to each of the existing NUREG 0737 Item II.B.3 clarification requirements, and requests that we provide a formal submittal "in an FSAR equivalent information" content which addresses these "further clarifications" for Zion Station. Therefore, it appears that Reference (a) is attempting to impose additional requirements on the Commonwealth Edison Company beyond NUREG 0737 explicit requirements and our commitments to same.

This matter was discussed with MR. John O. Thoma, the NRC Staff Lead Project Manager for this Item II.B.3. Mr. Thoma indicated that the NRC Staff has recognized this fact, and that the generic Item II.B.3 submittal request was in the process of being re-written to eliminate the imposition of new requirements prior to its being sent to Licensees. Mr. Thoma acknowledged that the

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Reference (a) Zion Station request for submittal was sent out prematurely without such correction.

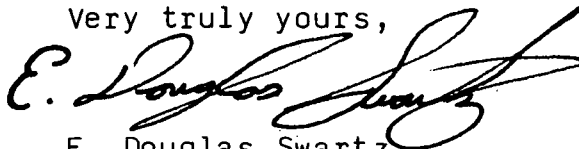
The NRC Staff has completed its review of our LaSalle County Station high radiation sampling system. As a result, the Safety Evaluation Report NUREG 0519 dated March 1981, concluded on Page 22-53, that the LaSalle County Station post accident sampling and analysis system "can meet the Item II.B.3 requirement as given in NUREG 0737 and is acceptable".

The Commonwealth Edison Company has, or is in the process of providing identical sampling panels at each of our nuclear stations. As a result, our implementation of the Item II.B.3 requirements are not plant specific in all cases. In the interest of minimizing the impact of the Reference (a) Zion Station request for information (and pending Dresden and Quad Cities requests) in terms of manpower and dollar resources on the Commonwealth Edison Company, and in terms of subsequent NRC Staff review time, we believe that the following action plan should be mutually desirable.

We propose that the Reference (a) Zion Station request for information be withdrawn and re-written by the NRC Staff consistent with our understanding of the pending Dresden and Quad Cities Station request letters. Upon our receipt of the Dresden, Quad Cities, and re-written Zion Station requests, we will concurrently develop and provide that portion of the request that we consider as plant unique. We will provide adequate referencing to the LaSalle County Station SER for any information that we consider as generic to our plants and which has already been accepted by the NRC Staff for our LaSalle County Station.

Your concurrence in this approach is hereby requested. Please address any questions that you or your staff may have concerning this matter to this office.

Very truly yours,



E. Douglas Swartz
Nuclear Licensing Administrator

cc: J. G. Keppler - Region III
RIII Inspector - Zion
D. L. Wigginton - ORB 1
J. O. Thoma - LB 1
R. B. Bevan - ORB 2
P. W. O'Connor - ORB 5
J. D. Hegner - ORB 2
V. Stello - DEDROGR