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

October 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
Supplemental Response to Generic
Letter No. 82-05 Concerning Various
NUREG 0737 Item Implementation Status
NRC Docket Nos. 50-237/249, 50-254/265
and 50-295/304

References (a): E. D. Swartz letter to D. G. Eisenhut dated April 15, 1982

(b): F. G. Lentine letter to D. G. Eisenhut dated July 14, 1982

(c): E. D. Swartz letter to D. G. Eisenhut dated September 3, 1982

(d): F. G. Lentine letter to H. R. Denton dated May 6, 1982

(e): F. G. Lentine letter to H. R. Denton dated April 13, 1982

Dear Mr. Eisenhut:

Reference (a) provided the Commonwealth Edison Company response to Generic Letter No. 82-05 concerning the implementation status of various NUREG 0737 items for our Dresden, Quad Cities and Zion Stations. Additionally, References (b) and (c) provided an updated status of completion for certain of these items.

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The Enclosure to this letter is being provided to advise the NRC Staff of recent developments which will not allow the completion of certain items on the schedules discussed in References (a), (b) and (c). Based on the explanation and justification provided in the Enclosure, we hereby request Commission approval to delay the implementation due dates to accommodate our current schedule requirements.

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

Please address any questions that you may have concerning this request for schedule delay to this office.

One (1) signed original and seventy-nine (79) copies of this letter are provided for your use.

Very truly yours,

E. Douglas Swartz
Nuclear Licensing Administrator

Enclosure

cc: J. G. Keppler, Regional
Administrator RIII
RIII Inspector - Dresden
RIII Inspector - Quad Cities
RIII Inspector - Zion
Roby B. Bevan - ORB 2
Paul W. O'Connor - ORB 5
David L. Wigginton - ORB 1

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ENCLOSURE

COMMONWEALTH EDISON COMPANY

Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Station Units 1 and 2

Supplemental response to Generic Letter No. 82-05 concerning the implementation status of various NUREG 0737 Items for which we request Commission approval to delay the implementation due date

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II.B.2 Plant Shielding
II.B.3 Post Accident Sampling
II.F.1.1 Noble Gas Effluent Monitor

Zion Station Implementation Status:

Reference (b) provided the updated status of completion at Zion Station for NUREG 0737 Items II.B.2, II.B.3 and II.F.1.1. We indicated that the installation of the new monitoring equipment would be completed for these items by October 1, 1982. WE EMPHASIZED THE NEED FOR NRC ACTION ON OUR PREVIOUS REFERENCE (d) REQUEST FOR A TECHNICAL SPECIFICATON CHANGE PRIOR TO OUR PLACING THE NEW MONITORS (II.B.2 and II.B.3) INTO OPERATION IN ORDER TO PRECLUDE OPERATION IN APPARENT VIOLATION OF THE LETTER OF TECHNICAL SPECIFICATION 3.14. Additionally, WE EMPHASIZED THE NEED FOR NRC ACTION ON OUR PREVIOUS REFERENCE (e) REQUEST FOR A LICENSE AMENDMENT TO ALLOW POSSESSION OF HIGH DOSE RATE SOURCE MATERIAL TO ALLOW FOR CERTAIN MONITOR CALIBRATIONS.

CONTINGENT UPON OUR RECEIPT OF THE REFERENCE (d) and (e) REQUESTED TECHNICAL SPECIFICATION CHANGE AND LICENSE AMENDMENT, the following schedules for completion of these items are anticipated:

II.B.2 Plant Shielding

During the recent preparation of the necessary functional testing, design deficiencies were discovered involving the use of incorrect power cable on the radiation monitors. Therefore, the installation of the radiation monitor control system for the HVAC supply air to the control room has been delayed until new power cable can be pulled. We expect to complete the required installation and functional testing by October 30, 1982. Following the functional testing, calibration of the radiation monitors will be initiated and are expected to be completed by early December. Additionally, once functional testing has been completed, operator training will be conducted and is expected to be completed by December 31, 1982. The health physicists and maintenance personnel have been trained.

II.B.3 Post Accident Sampling

The post accident sampling system has been completed since September 1, 1982 with the exception of the containment air sample radiation monitors. The monitors have been installed. However, complete functional testing has been delayed pending the resolution of recently discovered design deficiencies involving the use of incorrect power

cable. Following the replacement of this cable, we expect to complete the functional testing by October 30, 1982. Calibration of the radiation monitors will then commence and are expected to be completed by early December. Additionally, once functional testing has been completed, operator training will commence and is expected to be completed by December 31, 1982. The health physicists and maintenance personnel have been trained.

II.F.1.1 Noble Gas Effluent Monitor

The installation of the new auxiliary building radiation monitors was completed by October 1, 1982. However, complete functional testing has been delayed pending the resolution of recently discovered design deficiencies involving the use of incorrect power cable. Following the replacement of this cable, we expect to complete the functional testing by October 30, 1982. Calibration of the radiation monitors will then commence and are expected to be completed by early December. The development of a procedure to quantify the amount of radiation discharged from the vent stacks which addresses clarification item (4)(b) is currently underway. It is expected that this effort will also be completed and incorporated into procedures at the station in early December. Additionally, once functional testing has been completed, operator training will commence and is expected to be completed by December 31, 1982. The health physicists and maintenance personnel have been trained.

II.F.1.1 Noble Gas Effluent Monitor

Dresden and Quad Cities Response

Reference (c) discussed our status of implementing the clarification (4)(b) requirements. We indicated that a time dependent model was being developed and was expected to be complete by mid-September. Based upon this effort, we expected to modify station procedures by October 15, 1982. The schedule for development of the model has slipped due to the delay in our receipt of necessary vendor information. Detailed engineering drawings of the monitors which are necessary to confirm the geometry and dimensions used as input for the computer model were finally received on September 13. Based upon this delay, we expect to complete this effort and modify station procedures as appropriate by December 1, 1982.