



Commonwealth Edison
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December 22, 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
Clarification of BWR Mark 1
Containment Minor Modifications
NRC Docket Nos. 50-237/249 and
50-254/265

References (a): T. J. Rausch letter to H. R. Denton
dated December 16, 1982.

(b): D. Vassallo letter to L. DelGeorge
dated January 19, 1982.

Dear Mr. Denton:

In Reference (a), Commonwealth Edison responded to proposed Mark I Containment Order dates for Dresden Units 2 & 3 and Quad Cities Units 1 & 2 and acknowledged the NRC's categorization of major modifications. This letter is to clarify our position on the classification of major modifications as categorized in Attachment 1 to Reference (a).

The following specific modifications we now consider to come under the "remaining modifications" category, because in general, they are modifications to modifications:

- 1) SRV Discharge Line Support Rework - Initial modifications which were based on assumed loads have been completed. At this time, though, based on an assessment of preliminary plant unique analyses results, it appears that additional work will be required. This final additional Mark I rework is considered a minor modification.
- 2) SRV Discharge Line Vacuum Breakers - Again due to early specification of valves to an assumed loading function the valves which were procured for this application are being reworked. Therefore, this second installation is now considered a minor modification (which has been installed at Quad Cities Unit 1).

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- 3) Drywell/Wetwell DP - The DP system has been installed on each unit. It has been determined that the existing backup instrumentation should be more accurate. Replacement of the equipment needed to gain this additional accuracy is considered a minor modification.
- 4) SRV Logic - The only logic change which has been determined to be needed is that to prevent ADS actuation subsequent to SRV closure while the high water leg is still present. Although this is not a modification to a modification, considering the very low probability of having this random event from occurring during the short period of time that the high water leg exists, this modification is being classified as minor. This logic change is complete at Quad Cities 1, and will be completed at the next refueling outages for the remaining units.

This reclassification has minimal safety significance because as verified in the Short Term Program, each Mark I Containment system would maintain its integrity and functional capability when subjected to the most probable loads induced by a postulated design basis LOCA.

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

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,



Thomas J. Rausch
Nuclear Licensing Administrator

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cc: Region III Inspector - Dresden
Region III Inspector - Quad Cities

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