



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

January 14, 1983

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
Zion Station Units 1 and 2
Supplemental Response to Generic
Letter No. 82-05 concerning
Status of Implementation for
NUREG 0737 Item II.F.1.1
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): E. D. Swartz letter to D. G. Eisenhut
dated October 4, 1982.
- (c): F. G. Lentine letter to D. G. Eisenhut
dated November 29, 1982.
- (d): F. G. Lentine letter to H. R. Denton
dated December 7, 1982.

Dear Mr. Denton:

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 Item II.F.1.1 Noble Gas Effluent Monitoring.

The purpose of this letter is to advise the NRC Staff of recent developments which will not allow completion of NUREG 0737 Item II.F.1.1 clarification (4)(b) requirements on the schedules projected in References (b) and (c). Based upon the explanation and justification provided herein, we hereby request Commission approval to further delay the implementation due date in order to accommodate our current schedule requirements.

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Clarification (4)(b) to Item II.F.1.1 requires station procedures to have correction factor curves that can be used to correlate the high range noble gas monitor channel reading to the actual plant release. Additionally, as stated in Reference (d), this correlation is a required input to the Commonwealth Edison Company Offsite Dose Calculation System (ODCS) program.

Our continuing difficulties in developing an accurate correlation of the instrument reading to plant release are currently being reviewed. The data provided by the SPING manufacturer (Eberline), and Radiological and Chemical Technology, Inc. (RCT) who was contracted to perform and provide various calibration data, was utilized to develop the correction curves. However, the theoretical extrapolations from these two sets of data generated two significantly different correction curves for high energy radiation.

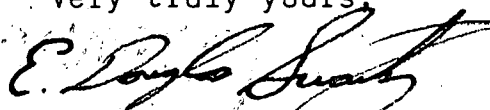
Our ODCS is designed to utilize this information as an input and ultimately compare the processed value to the established emergency action levels (EALs), and trigger an alarm when an EAL has been met or exceeded. In view of the unresolved discrepancies between the curves described above, it is our judgement that our recently developed curves cannot be relied upon for this purpose at this time.

In order to resolve this issue, the Commonwealth Edison Company may need to obtain additional data for the SPING high energy range. This process may take several months to purchase the appropriate source and perform the tests. Subsequently, we would then develop new correction curves and incorporate them into our station procedures. Our projected completion date for this effort is now July 1, 1983.

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

One (1) signed original and eighty (80) additional copies of this letter are provided for your use.

Very truly yours,



E. Douglas Swartz
Nuclear Licensing Administrator

cc: Mr. J. G. Keppler, RIII
RIII Inspector - D
RIII Inspector - QC
RIII Inspector - Z