



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

July 20, 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
LaSalle County Station Units 1 and 2
Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
Supplemental Response to NUREG 0737 -
Supplement 1 (Generic Letter No. 82-33)
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454/455 and
50-456/457

- References (a): Cordell Reed letter to H. R. Denton
dated April 14, 1983
- (b): D. G. Eisenhut letter to All OLS,
Applicants and CPs dated December 17, 1982
(Generic Letter No. 82-33)

Dear Mr. Denton:

Reference (a) provided the Commonwealth Edison Company response to NUREG 0737 Supplement 1 as requested by Reference (b) for our Dresden, Quad Cities, Zion, LaSalle County, Byron and Braidwood Stations. The purpose of this supplemental response is to clarify our Reference (a) position concerning the requirements for SPDS safety analyses.

Reference (b) paragraph 4.2.a requires the Licensee to prepare a written safety analysis regarding SPDS parameter selection. Our Reference (a) response (Section 2 paragraphs 4.2.a and 4.2.b) to this requirement provided a discussion that was centered around our 10 CFR 50.59 safety evaluation practices. Subsequent discussions between NRC Project Management and Commonwealth Edison confirmed our misinterpretation of the Supplement 1 requirements in this matter.

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As we now understand the requirements, NUREG 0737 - Supplement 1 and the explanations provided thereof by the NRC Staff during the Region III workshop address three (3) distinct areas to be covered by the SPDS safety analysis as follows:

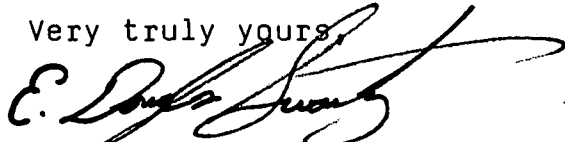
- a) Provide a description of the criteria for selection of parameters which provide information on the five critical safety functions.
- b) Perform a Human Factors Review of the data display and functions incorporated into the SPDS using the Operating Personnel Survey and SPDS Checklist Study described in Reference (a) Section 7.
- c) Verify SPDS parameter selection utilizing the results of the DCRDR Task Analysis Data Review and DCRDR Validation Data Review described in Reference (a) Section 7.

Based on our understanding of the requirements, we expect to submit Item (a) by December 31, 1983 for each of our Stations. Items (b) and (c) will be performed as part of the Verification and Validation Program to be completed with the SPDS Human Factors Review. Our schedule for completion of Items (b) and (c) is estimated to be six (6) months after NRC Staff final acceptance of the DCRDR Summary Report for each of our Stations, or the operational date for each Station's SPDS whichever occurs later.

Please address any questions that you or your Staff may have concerning this supplemental response to this office.

One (1) signed original and forty (40) 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 Inspectors - D/QC/Z/LC/B/B