



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

July 28, 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  
Revised Commitment Regarding NUREG-0737  
Supplement 1, Generic Letter No. 82-33  
NRC Docket Nos. 50-237/249, 50-254/265,  
50-295/304, 50-373/374, 50-454/50-455,  
and 50-456/457

- Reference (a): D. G. Eisenhut letter to All Ols, Applicants  
and CPs dated December 17, 1982 (Generic  
Letter No. 82-33)
- (b): Cordell Reed letter to H. R. Denton  
dated April 14, 1983.
- (c): E. D. Swartz letter to H. R. Denton  
dated July 20, 1983.

Dear Mr. Denton:

Reference (a) requested that the Commonwealth Edison Company provide, by April 15, 1983, a proposed schedule for completion of certain Emergency Response Capability items as identified in Reference (a) Supplement 1 to NUREG 0737 for our Dresden, Quad Cities, Zion, LaSalle County, Byron and Braidwood Stations. Reference (b) provided Commonwealth Edison Company's original response.

Commonwealth Edison Company personnel participated in the Region III workshop on Reference (a). As a result of that workshop and discussions with NRC Project Management, Reference (c) was submitted to supplement Reference (b) regarding SPDS safety analysis.

During discussions between NRC Licensing Project Managers and Commonwealth Edison personnel, we became aware that the NRC had certain basic areas of concerns with Reference (b). A telecon was held on July 27, 1983 between Mr. Roby Bevan, et al of your staff and C. W. Schroeder et al of Commonwealth Edison Company. That telecon resulted in a common understanding of the licensee's and the NRC's positions regarding our commitments.

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H. R. Denton

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July 28, 1983

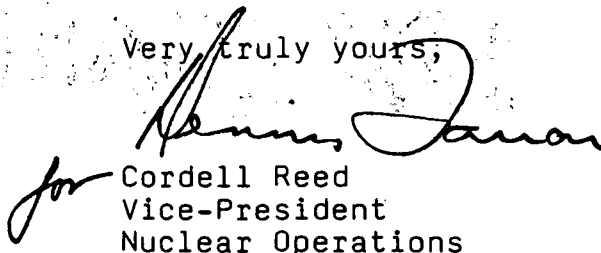
The purpose of this letter is to provide Commonwealth Edison Company's revised commitments regarding NUREG-0737, Supplement 1 and Generic Letter 82-33. Enclosed please find a Statement of Commitment by Commonwealth Edison Company, which supercedes all previous commitments in this regard. The enclosed Statement has been prepared in a format suitable for direct incorporation into one Confirmatory Action Letter for all six Commonwealth Edison Company nuclear stations.

To the best of my knowledge and belief, the statements contained herein and in the Attachments 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 further questions that you or your Staff may have concerning this submittal to the Director of Nuclear Licensing.

One (1) signed original and forty (40) copies of this letter with Attachments are provided for your use.

Very truly yours,

  
for Cordell Reed  
Vice-President  
Nuclear Operations

CWS/lm

Attachments

cc: Mr. J. G. Keppler, Region III  
RIII Inspectors - D/QC/Z/LS/B/B

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## Statement of Commitment By Commonwealth Edison Company

### Conditions of Commitment

1. This commitment is a single, non-separable entity incorporating Commonwealth Edison Company's joint position for:

- 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

This program and its completion dates have been prepared based upon this combined effort. Any NRC required changes in the completion date for any station(s) or unit(s) negates all commitments in this regard due to the integrated nature of our commitment.

2. Commonwealth Edison Company reserves the right to modify our proposed schedules and commitments should unforeseen changes such as the following occur:

- (a) Some dates and/or time intervals are based upon NRC Staff milestones for completion of a given task (e.g. NRC approval of Owners Group ERGs and EPGs). Should NRC Staff projected completion dates slip for any given item, the Commonwealth Edison proposed dates or time intervals following such milestones will slip accordingly.
- (b) Future GSEP drills and exercises may suggest the need for human factored improvements in our Emergency Response Capabilities. Changes to our facilities and commitments will be considered accordingly.
- (c) Should future publications or revisions to guidance documents including Regulatory Guides (e.g. RG 1.97 Rev. 3), Owners Group EPGs, or NUREGs related or unrelated to the SECY 82-111b requirements impact our technical or schedular commitments, changes to our commitments may become desirable and will be evaluated.
- (d) Our implementation schedule of the SECY 82-111b requirements for each of our plants has taken into account other competing regulatory requirement schedules and CECO. objectives. However, should future conflicts arise, changes to our commitments may become desirable and will be evaluated.

3. The NRC staff will use the Commonwealth Edison Company DCRDR program plan as an important tool in any review or audit of the Commonwealth Edison Company DCRDR effort.

Commitment

Subject to the above conditions of commitment, Commonwealth Edison Company agrees to:

1. Perform those actions specified in Sections 1 through 8 of the Attachment to the Cordell Reed letter to H. R. Denton dated April 14, 1983.
2. With the exception of the DCRDR, perform (1) above on the schedules specified in Section 9 of the Attachment to the Cordell Reed letter to H. R. Denton dated April 14, 1983. With respect to the schedule for the performance of the Detailed Control Room Design Review (DCRDR), this review will be performed in accordance with the following schedule:
  - Start Dresden DCRDR - December 1, 1983  
Submit Final Summary Report - May 1, 1985
  - Start Quad Cities DCRDR - June 1, 1984  
Submit Final Summary Report - May 1, 1985
  - Start LaSalle County DCRDR - December 1, 1984  
Submit Final Summary Report - November 1, 1985
  - Start Zion DCRDR - June 1, 1985  
Submit Final Summary Report - May 1, 1986
  - Start Byron DCRDR - December 1, 1985  
Submit Final Summary Report - December 1, 1986
  - Start Braidwood DCRDR - June 1, 1986  
Submit Final Summary Report - November 1, 1986
3. Address industry experience and events through the reviews of INPO/NSAC SERs and SOERs as described in the DCRDR program plan.
4. As part of the DCRDR, address changes or modifications to Control Room panels which have been installed or for which a modification package is being installed prior to the completion of the review phase of the DCRDR for that station.
5. Perform a SPDS safety analysis as described in the E. D. Swartz letter to H. R. Denton dated July 20, 1983. This safety analysis will be performed in accordance with the schedule specified in that letter.