



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

August 25, 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

- References (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.
- (d): Cordell Reed letter to H. R. Denton dated July 28, 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 which further clarified Reference (a). As a result of that workshop and discussions with NRC Project Management, Reference (c) was submitted to supplement Reference (b) with regard to completion of SPDS safety analyses.

During subsequent 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 led to a common understanding of our mutual positions regarding our commitments and resulted in our letter of July 28, 1983, Reference (d).

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August 25, 1983

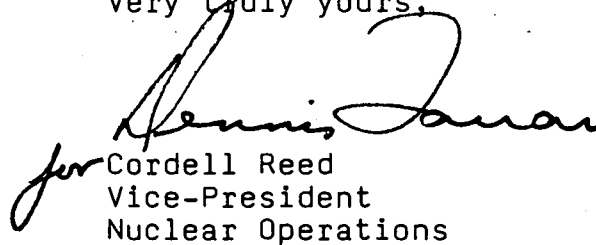
The purpose of this letter is to provide Commonwealth Edison Company's revised commitments regarding NUREG-0737, Supplement 1 and Generic Letter 82-33 in a tabular form which supercedes Section 9 of our April 14, 1983 letter. Also, enclosed please find a Statement of Commitment by Commonwealth Edison 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 Order 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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## ATTACHMENT A

### 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) may require additional changes in other commitments because of the integrated nature of our commitment.

2. Commonwealth Edison recognizes the NRC's responsibility and authority to issue mandated schedules for the completion of important items which affect our Emergency Response Capability. The schedule we have proposed as a revised Section 9 of our response to Generic Letter No. 82-33 (Attachment B to this letter) reflects our best effort to complete these items in an orderly, well-planned manner and at a rate which is consistent with the ability of station personnel to assimilate change. The schedule was prepared so as to incorporate realistic considerations of financial, hardware, and human resource constraints in its implementation. It is also based upon our best assumptions concerning the dates for completion of certain prerequisites or concomitant items, several of which are beyond our control. Some of these uncertainties are detailed below. Should our assumptions about these concerns prove to be in error, we will inform the NRC as soon as practicable and request a modification to any Confirmatory Order or License Condition which has been issued to impose the schedule.

- (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 in accordance with the schedule as provided in Attachment B of this letter.
2. Address industry experience and events through the reviews of INPO/NSAC SERs and SOERs as described in the DCRDR program plan.
3. 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.
4. 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 herein.

ATTACHMENT B

Revised Section 9 Schedule to the Cordell Reed  
Letter to H.R. Denton dated April 14, 1983

SECTION 9 - SCHEDULES

<u>EMERGENCY RESPONSE CAPABILITY</u>	<u>DRESDEN</u>	<u>QUAD CITIES</u>	<u>LASALLE</u>	<u>ZION</u>	<u>BYRON</u>	<u>BRAIDWOOD</u>
<b>I. SAFETY PARAMETER DISPLAY SYSTEM (SPDS)</b>						
a. Submit Safety Analysis						
1) Criteria for parameter selection	12-31-83	12-31-83	12-31-83	12-31-83	12-31-83	12-31-83
2) HFR of data display and functions (assumes NRC acceptance of DCRDR final summary report within 2 months)	01-01-86	01-01-86	07-01-86	01-01-87	08-01-87	08-01-87
3) Verify parameter selection (assumes NRC acceptance of DCRDR final summary report within 2 months)	01-01-86	01-01-86	07-01-86	01-01-87	08-01-87	08-01-87
b. SPDS Operational - Defined as design, hardware installation, functional and pre-operational testing, and initial operator training complete	01-01-85	06-01-85	Unit 1 complete Unit 2 prior to commercial service	Complete	Prior to commercial service	Prior to commercial service
c. Modifications to SPDS resulting from DCRDR, SPDS HFR, or RG 1.97						
1) Submit schedule	01-01-86	01-01-86	07-01-86	01-01-87	08-01-87	08-01-87
<b>II. DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)</b>						
a. Submit Program Plan	Complete	Complete	Complete	Complete	Complete	Complete
b. Submit Final Summary Report	05-01-85	05-01-85	11-01-85	05-01-86	12-01-86	12-01-86
<b>III. REGULATORY GUIDE 1.97 - REVISION 2</b>						
a. Submit a preliminary report describing how the requirements of Reg. Guide 1.97 specified in Supplement 1 to NUREG-0737 have been or will be met.	08-01-85	08-01-85	02-01-86	08-01-86	03-01-87	03-01-87
b. Submit a final report including a schedule for installation (assumes NRC acceptance of DCRDR results within 3 months of submittal date of DCRDR summary report for that Station).	02-01-86	02-01-86	08-01-86	02-01-87	09-01-87	09-01-87

<u>EMERGENCY RESPONSE CAPABILITY</u>	<u>DRESDEN</u>	<u>QUAD CITIES</u>	<u>LASALLE</u>	<u>ZION</u>	<u>BYRON</u>	<u>BRAIDWOOD</u>
<b>IV. UPGRADE EMERGENCY OPERATING PROCEDURES (EOPs)</b>						
a. Submit Procedures Generation Package assuming NRC approval of BWR OG EPGs Revision 3 by 09-30-83 and NRC approval of W OG EPGs Revision 1 by 3-1-84.	09-30-84	09-30-84	09-30-84	03-01-85	03-01-85	03-01-85
b. Implement upgraded EOPs based upon Revision 3 for BWRs and Revision 1 for PWRs	09-30-85	09-30-85	09-30-85	03-01-86	03-01-86	03-01-86
<b>V. EMERGENCY RESPONSE FACILITIES</b>						
a. Technical Support Center (TSC)						
1) Complete with the exception of impact due to RG 1.97 and HFR	Complete	Complete	Complete	Complete	Prior to Fuel Load	Prior to Fuel Load
2) Modifications to TSC resulting from RG 1.97 and HFR (assumes NRC acceptance of DCRDR results with 3 months of submittal date of DCRDR summary report for that station)						
a. Submit schedule	11-01-85	11-01-85	05-01-86	11-01-86	06-01-87	06-01-87
b. Operational Support Center (OSC)	Complete	Complete	Complete	Complete	Prior to Fuel Load	Prior to Fuel Load
c. Emergency Operations Facility (EOF)						
1) Complete with the exception of impact due to RG 1.97 and HFR, and A-model, and industrial security	Complete	Complete	Complete	Complete	Prior to Fuel Load	Prior to Fuel Load
a. Modifications to EOF resulting from RG 1.97 and HFR						
1) Submit schedule	11-01-85	11-01-85	05-01-86	11-01-86	06-01-87	06-01-87
b. Implement A-model	01-01-85	01-01-85	Complete	Complete	Prior to Fuel load	Prior to Fuel load
c. Implement Industrial Security including remote alarm	06-01-84	06-01-84	06-01-84	Complete	Prior to Fuel Load	Prior to Fuel Load