



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

December 6, 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  
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.
- (e): Cordell Reed letter to H.R. Denton  
dated August 25, 1983.
- (f): C. W. Schroeder letter to H. R. Denton  
dated June 16, 1982.
- (g): Cordell Reed letter to H. R. Denton  
dated November 15, 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 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. References (c), (d) and (e) modified reference (b) following clarification of Nuclear Regulatory Commission guidance.

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This letter revises the consolidated commitments provided by reference (e). It is now apparent that part of the equipment required to satisfy our commitment regarding item V.c.l.b at Byron will not be operational prior to fuel load of Unit 1. Specifically, the EOF A-model, a plant computer based, real time dose calculation system described in reference (f) will not be available. Interim compensatory measures are described here. Since dose calculations will be available through other means, this change does not significantly alter our ability to respond in an emergency.

Commonwealth Edison will not be able to fully implement the A-model at Byron Station prior to scheduled fuel load because of delays in developing a data link between the radiation monitor RM-11 microprocessor and the P-2500 process computer. The program will run, but it will not have hard-wired input of some of the input parameters. Our current estimate is that the A-model will not be fully functional and tested until July 31, 1984.

In the EOF, the Commonwealth Edison C-model will be used as a compensating measure for lack of an A-model. The C-model, as described in reference (f), is essentially the same as the A-model except that it does not operate in real time. Meteorological data will be obtained by demand poll or from information provided by the station. Radioactive effluent release rate or radioactivity in containment, two important parameters in both the A- and C-models, will be provided from the RM-11. A-model results generated as a result of A-model compensating measures initiated in the control room will be available in the EOF.

Data from area and process radiation monitors is provided to the RM-11 in the control room for display, storage, and alarming at pre-set limits. Meteorological data, flow rate information for computing release rates, and the initial part of the A-model program will be available in the Westinghouse P-2500 process computer prior to fuel load. The delay of the data link between the RM-11 and the P-2500 will prevent the A-model from operating in a fully automatic mode at the time of fuel load.

The compensating measure for the control room consists of a procedure change and adjustments to the A-model program. If an EAL for radioactivity in containment or vent stack monitor is met, the RM-11 will alarm. Control room personnel will verify that the alarm is valid and then manually input the maximum value of the appropriate radiation reading displayed on the RM-11 into the process computer. The A-model program will then provide results the same as originally planned. Control room personnel will periodically monitor the RM-11 and repeat the process if new maximum radiation readings are noted.

Attachment A has been updated to reflect the proposed schedule change.

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,



Cordell Reed  
Vice-President  
Nuclear Operations

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Attachments

cc: Mr. J. G. Keppler, Region III  
Resident Inspector - Byron

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ATTACHMENT A

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

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EMERGENCY RESPONSE CAPABILITY

DRESDEN

QUAD CITIES

LASALLE

ZION

BYRON

BRAIDWOOD

IV. UPGRADE EMERGENCY OPERATING PROCEDURES (EOPs)

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	12-31-84	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	12-31-85	03-01-86	03-01-86

V. EMERGENCY RESPONSE FACILITIES

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 within 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
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b. Operational Support Center (OSC)

		Complete	Complete	Complete	Complete	Prior to Fuel Load	Prior to Fuel Load
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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
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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
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b. Implement A-model

		01-01-85	01-01-85	Complete	Complete	07-31-84	Prior to Fuel load
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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
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## SECTION 9 SCHEDULES

## EMERGENCY RESPONSE CAPABILITY

DRESDEN

QUAD CITIES

LASALLE

ZION

BYRON

BRAIDWOOD

## I. SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

## a. Submit Safety Analysis

1) Criteria for parameter selection including V&V description	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 and software installation, functional testing, and initial operator training complete

01-01-85	06-01-85	Unit 1 complete Unit 2 prior to completion of startup test program	Complete	Prior to commercial service	Prior to commercial service
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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
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## II. DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

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

## III. REGULATORY GUIDE 1.97 - REVISION 2

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	Complete	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