



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

February 14, 1985

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 Unit 1  
Response to Generic Letter No. 84-24  
NRC Docket Nos. 50-237/249, 50-254/265,  
50-295/304, 50-373/374, 50-454

Reference (a): Generic Letter 84-24 - D. G. Eisenhut letter  
to All OLs and Applicants for Operating License

Dear Mr. Denton:

In response to Generic Letter 84-24, attached are sheets containing the requested information for affected CECO facilities.

An extension of time to respond was requested from the NRC Project Manager for each site. In each case an extension until February 15 was granted.

To the best of my knowledge and belief the statements contained in the Attachment 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, contractor employees and consultants. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

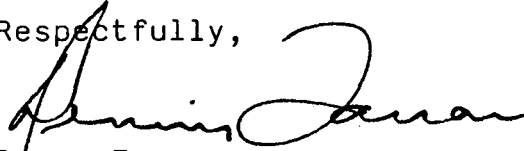
Please address any questions that you or your staff may have concerning our response to this office.

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One (1) signed original with Attachment and fifteen copies are enclosed for your use.

Respectfully,



D. L. Farrar  
Director of Nuclear Licensing

Attachments

cc: US NRC, Document Control Desk  
Washington, DC

RIII Inspectors - D/QC/Z/LSC/BY

SUBSCRIBED and SWORN to  
before me this 15th day  
of February, 1985

Rosalie A. Prenta  
Notary Public

ATTACHMENT

COMMONWEALTH EDISON COMPANY

RESPONSE TO GENERIC LETTER 84-24  
"CERTIFICATION OF COMPLIANCE TO 10 CFR 50.49"

- Part I - Dresden Station Units 2 and 3
- Part II - Quad Cities Station Unit 1
- Part III - Quad Cities Station Unit 2
- Part IV - Zion Station Unit 1
- Part V - Zion Station Unit 2
- Part VI - LaSalle County Station Units 1 and 2
- Part VII - Byron Station Unit 1

ATTACHMENT PART I  
DRESDEN STATION UNITS 2 AND 3

The following certifications do not apply to Regulatory Guide 1.97 equipment which will be qualified according to the schedules submitted by the company in response to Generic Letter 82-33.

- (a) The Environmental Qualification Program being implemented for Dresden Station meets the intent of 10 CFR 50.49 as we interpret the rule. Based on our present knowledge no further schedular extension will be required; however we reserve the option to ask for appropriate relief as future conditions dictate.
- (b) The plant has at least one path to safe shutdown using fully qualified equipment and equipment for which justifications for continued safe operation have been submitted.
- (c) All existing equipment identified as within the scope of 50.49 is either fully qualified or has had a JCO submitted pending full qualification.

CECo. has in place a program to review IE Bulletins and Information Notices for applicability to our facilities. This includes the identification and evaluation of potential EQ problems.

ATTACHMENT PART II  
QUAD CITIES STATION UNIT 1

The following certifications do not apply to Regulatory Guide 1.97 equipment which will be qualified according to the schedules submitted by the Company in response to Generic Letter 82-33.

- (a) The Environmental Qualification Program implemented for Quad Cities Unit 2 meets the intent of 10 CFR 50.49 as we interpret the rule.
- (b) The plant has at least one path to safe shutdown using fully qualified equipment and equipment for which justifications for continued safe operation have been submitted.
- (c) All existing equipment identified as within the scope of 50.49 is fully qualified or a JCO has been submitted pending fully qualification.

CECo. has in place a program to review IE Bulletins and Information Notices for applicability to our facilities. This includes the identification and evaluation of potential EQ problems.

ATTACHMENT PART III

QUAD CITIES STATION UNIT 2

The following certifications do not apply to Regulatory Guide 1.97 equipment which will be qualified according to the schedules submitted by the Company in response to Generic Letter 82-33.

- (a) The Environmental Qualification Program being implemented for Quad Cities Unit 2 meets the intent of 10 CFR 50.49 as we interpret the rule. Based on our present knowledge no further schedular extension will be required; however, we reserve the option to ask for appropriate relief as future conditions dictate.
- (b) The plant has at least one path to safe shutdown using fully qualified equipment and equipment for which justifications for continued safe operation have been submitted.
- (c) All existing equipment identified as within the scope of 50.49 is either fully qualified or has had a JCO submitted pending full qualification.

CECo has in place a program to review IE Bulletins and Information Notices for applicability to our facilities. This includes the identification and evaluation of potential EQ problems.

ATTACHMENT PART IV

ZION STATION UNIT 1

The following certifications do not apply to Regulatory Guide 1.97 equipment which will be qualified according to the schedules contained in the Confirmatory Order transmitted June 12, 1984 from S. A. Varga to D. L. Farrar.

A NRC 50.49 audit of Unit 2 was recently conducted; the audit resulted in several open and unresolved items. In as much as these items affect Unit 1, the certifications are made assuming ultimate resolution of the items in favor of the Company's positions.

- (a) The Environmental Qualification Program being implemented for Zion Unit 1 meets the intent of 10 CFR 50.49 as we interpret the rule. Based on our present knowledge no further schedular extension will be required; however, we reserve the option to ask for appropriate relief as future conditions dictate.
- (b) The plant has at least one path to safe shutdown using fully qualified equipment and equipment for which justifications for continued safe operation have been submitted.
- (c) All existing equipment identified as within the scope of 50.49 is either fully qualified or has had a JCO submitted pending full qualification.

CECo. has in place a program to review IE Bulletins and Information Notices for applicability to our facilities. This includes the identification and evaluation of potential EQ problems.

ATTACHMENT PART V

ZION STATION UNIT 2

The following certifications do not apply to Regulatory Guide 1.97 equipment which will be qualified according to the schedules contained in the Confirmatory Order transmitted June 12, 1984 from S. A. Varga to D. L. Farrar.

A NRC 50.49 audit of Unit 2 was recently conducted; the audit resulted in several open and unresolved items. The certifications are made assuming ultimate resolution of the items in favor of the Company's positions.

- (a) The Environmental Qualification Program implemented for Zion Unit 2 meets the intent of 10 CFR 50.49 as we interpret the rule.
- (b) The plant has at least one path to safe shutdown using fully qualified equipment and equipment for which justifications for continued safe operation have been submitted.
- (c) All existing equipment identified as within the scope of 50.49 is fully qualified or a JCO has been submitted pending full qualification.

CECo. has in place a program to review IE Bulletins and Information Notices for applicability to our facilities. This includes the identification and evaluation of potential EQ problems.



ATTACHMENT PART VI

LASALLE COUNTY STATION UNITS 1 AND 2

The following certifications do not apply to Regulatory Guide 1.97 equipment which will be qualified according to the schedules submitted by the Company in response to Generic Letter 82-33.

- (a) The Environmental Qualification Program being implemented for LaSalle County Units 1 and 2 meets the intent of 10 CFR 50.49 as we interpret the rule. The Company has submitted a request for schedular extension until November 30, 1985 on a number of items. At this time the Commission's response to this request is still pending.
- (b) At least one path to safe shutdown is available using fully qualified equipment and/or equipment in plant locations unaffected by the accident.
- (c) All existing equipment identified as within the scope of 50.49 and not addressed in our pending request for extension is fully qualified or will be qualified prior to any unit operation after March 31, 1985.

CECo has in place a program to review IE Bulletins and Information Notices for applicability to our facilities. This includes the identification and evaluation of potential EQ problems.

ATTACHMENT PART VII

BYRON STATION UNIT 1

The following certifications do not apply to Regulatory Guide 1.97 equipment which will be qualified according to the schedules contained in the Operating License attachment.

- (a) The Environmental Qualification Program being implemented for Byron Unit 1 meets the intent of 10 CFR Section 50.49 as we interpret the rule. Based on our present knowledge no further schedular extension will be required; however, we reserve the option to ask for appropriate relief as future conditions dictate.
- (b) The plant has at least one path to safe shutdown using fully qualified equipment and equipment for which justifications for continued safe operation have been submitted.
- (c) All existing equipment identified as within the scope of 50.49 is either fully qualified or has had a JCO submitted pending full qualification. For Byron all components within the scope of 50.49 are classified as safety related and qualified accordingly.

CECo. has in place a program to review IE Bulletins and Information Notices for applicability to our facilities. This includes the identification and evaluation of potential EQ problems.