



Commonwealth Edison
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Address Reply to: Post Office Box 767
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August 29, 1985

Mr. H. L. Thompson, Jr., Director
Division of Licensing
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. 85-07
Implementation of Integrated Schedules
for Plant Modifications
NRC Docket Nos. 50-237/249, 50-254/265,
50-295/304, 50-373/374, 50-454

Dear Mr. Thompson:

Generic Letter 85-07 requested information concerning Commonwealth Edison's views, intentions, and concerns regarding the development of an integrated schedule for plant modifications at each of our operating nuclear stations. The attachment to this letter provides the information requested in Generic Letter 85-07 in the format outlined in enclosure two of that letter. Commonwealth Edison Company agrees that the implementation of integrated schedules of utility and NRC initiated plant modifications appears to offer certain advantages over the present method of modification controls. Commonwealth Edison has been methodically developing the scheduling requirements to implement an integrated schedule at our Zion station. The scheduling network is developed to the stage where information will be inputted for a small sample of modifications associated with the next Zion 2 refueling outage. Following this experience and after any needed modifications to the methodology, we propose to implement a prioritization process for modification requirements which will allow us to assimilate new modifications into the schedule. Following the adoption of that prioritization methodology, it is our intention to pursue a licensing amendment with you to implement the complete program.

If the program is successful at Zion Station, we intend to pursue the development of similar integrated schedule methodologies at our other nuclear stations.

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G. L. Alexander

G. L. Alexander
Nuclear Licensing Administrator

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Attachment
RESPONSE TO GENERIC LETTER 85-07

Plant Name: Dresden, Quad Cities, Zion, LaSalle, and Byron

Utility: Commonwealth Edison Company

I. INTENTION:

- A. We intend to work with the staff to develop an integrated schedule methodology for Zion Station. Following completion of the development of that methodology and after some experience with it, we plan to implement a similar scheduling methodology for Dresden, Quad Cities, LaSalle and Byron.

II. STATUS

- A.1 We have not settled on a methodology for prioritizing modifications at our stations. Our current view is that the initial prioritization will be based largely on engineering judgements. Following that, it is our belief that a cost benefit analysis methodology will be developed based on factors characterizing our perception of relative importance of the modification at a specific station. We believe the final prioritization methodology should be selected before Spring, 1986.
- A.2 Before approaching the NRC for a license amendment, we would like to have one year of experience using the system. At that time, we will contact the NRC in order to arrange a schedule.