



**Commonwealth Edison**  
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Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

September 30, 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  
Request for Approval of Alternate  
Seismic Evaluation Criteria and  
Methodology  
NRC Docket Nos. 50-237, 50-249,  
50-254 and 50-265

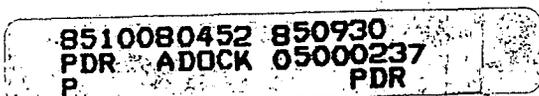
Reference: Report of the U.S. Nuclear Regulatory  
Commission Piping Review Committee,  
NUREG-1061

Dear Mr. Denton:

The purpose of this transmittal is to request your review and approval of proposed alternate methods and criteria for performing seismic evaluations at Dresden and Quad Cities Stations. The proposed alternatives include the criteria and methodology currently described in the Dresden and Quad Cities Final Safety Analysis Reports (FSAR) and additional alternatives which incorporate more modern analytical techniques and methods.

The original FSAR methods and criteria for performing piping system analyses are based on 1960's technology and result in an overly-conservative assessment of design margins. This, in turn, results in more and larger pipe supports than actually required to meet safety goals. Our proposed alternatives incorporate more recent techniques and criteria which reduce the degree of conservatism and more accurately reflect actual design margins. This can result in the need for fewer piping supports which, as noted in the Reference, can increase system reliability and maintainability. In addition, fewer supports require less construction and inspection time, thereby reducing personnel radiation exposure.

The enclosed report, "Proposed Alternate Seismic Evaluation Criteria/Methodology", provides a detailed discussion of the proposed methods and criteria. The specific alternatives for which we request approval (in addition to the existing FSAR methods) are summarized in Section 4. Many of the proposed changes are discussed and endorsed in the referenced NUREG document.



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Our request involves a change in analytical methods and criteria which will more accurately reflect actual design margins without compromising the margin of safety. As such, we feel the proposed alternatives satisfy the criteria of 10 CFR 50.59. However, since they represent a significant change to past practice and our design basis in the FSAR, we request your formal review and approval. Upon receipt of your approval, we will prepare and implement appropriate revisions to the Updated FSARs for Dresden and Quad Cities reflecting the allowable alternatives.

One (1) signed original and sixty (60) copies of this letter are provided for your use. Ten (10) copies of the enclosed report, "Proposed Alternate Seismic Evaluation Criteria/Methodology" are also provided.

If you have any questions regarding this transmittal or require additional copies of the enclosure, please contact this office.

In accordance with 10 CFR 170.12, a fee remittance in the amount of \$150.00 is enclosed.

Very truly yours,



J. R. Wojnarowski  
Nuclear Licensing Administrator

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Enclosures

cc: R. Gilbert - NRR  
R. Bevan - NRR  
J. Streeter - Region III  
NRC Resident Inspector - Dresden  
NRC Resident Inspector - Quad Cities

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