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October 7, 1988

Mr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Commitment to Perform Seismic
Qualification Utility Group (SQUG)
Walkdown
Docket Nos. 50-237 and 50-249

Dear Mr. Murley:

On July 29, 1988, the NRC Staff issued a Safety Evaluation Report (SER) on Revision 0 of the Generic Implementation Procedure (GIP) developed by Seismic Qualification Utility Group (SQUG). The letter to SQUG enclosing the SER, requests that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By letter to Mr. Shao dated August 19, 1988, SQUG clarified that the sixty days would expire on October 7, 1988. This letter responds to that request.

According to the generic schedule submitted by SQUG in its October 9, 1988 letter, the GIP was to be completed by the end of calendar 1988, followed by NRC review in the first quarter of 1989. Given the delay in SER issuance, this objective is probably no longer achievable. Completion of the GIP in the first quarter of 1989 is dependent upon: (1) satisfactory and timely resolution of all outstanding issues, (2) accomplishment of all interim milestones as set forth in the schedule and (3) continued agreement between SQUG and NRC on major technical and licensing issues.

As the SER acknowledges, the GIP is not yet complete. Several technical areas have not yet been fully included in the GIP. Moreover, the SER does not resolve certain licensing issues central to completion of the GIP raised in Part 1 of Revision 0. Commonwealth Edison (CECo) will not be in a position to establish the scope of its A-46 commitment until the GIP is completed and all licensing issues resolved. Given the magnitude of the effort required to achieve resolution of USI A-46, final implementation must be carefully integrated into outage schedules. Assuming no significant changes

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in the workscope currently envisioned for resolution, the plant walkdown associated with the resolution of this issue can be undertaken by the conclusion of the second refueling outage after the final SER is issued and open items resolved. 1/ Identification of safe shutdown equipment and other tasks necessary to prepare for the walkdown will be accomplished prior to this outage. If the GIP is completed during the first quarter of 1989, and a final SER with no open items or significant change in work scope is issued in the second quarter for 1989, this outage would commence for Dresden on or about February 1992 for Unit 2 and March 1991 for Unit 3. If the schedule for GIP development and NRC review slips further, the walkdown and other activities would have to be delayed.

CECo will review the final GIP after approval by the NRC and resolution of all outstanding issues. Based on this review, CECo will either commit to pursue a generic resolution of USI A-46 or file a plant-specific response. Should the generic resolution be pursued, Commonwealth Edison may, at its option, elect not to perform certain aspects of the generic program based upon suitable justification. CECo also reserves the right to pursue all available appeal options.

Very truly yours,



J. A. Silady
Nuclear Licensing Administrator

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cc: B.L. Siegel - Project Manager, NRR
S.G. DuPont - Dresden Resident Inspector

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- 1/ This schedule is contingent upon a number of factors including:
(1) those noted above, (2) the scope and schedule for the conduct of SQUG training, and (3) the resource problem created by many licensees competing for use of limited industry expertise available to assist such efforts

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