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June 26, 1990

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Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

ATTN: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3  
Quad Cities Nuclear Power Station Units 1 and 2  
LaSalle County Nuclear Power Station Units 1 and 2  
BWR Post-Accident Neutron Flux Monitoring  
System (NFMS) Upgrade For Regulatory Guide 1.97  
NRC Docket Nos. 50-237, 249, 254, 265, 373 and 374

References: See attached list of six references.

Dr. Murley:

Commonwealth Edison (CECo) requests an extension in submitting schedules for installation of the subject post-accident Neutron Flux Monitoring System (NFMS) upgrade at its BWR stations. This request would defer a CECo response until: a) all significant issues on the subject between the NRC and the BWR Owners' Group (BWROG) are resolved, and b) a generic design specification for the qualification of equipment for a post-accident NFMS is established and agreed upon by the NRC and the BWROG. CECo has been, and will continue to be, active in the BWROG efforts to address the NFMS issue.

Reference 1 presented the NRC's position (SER) on installation of a post-accident NFMS system by rejecting the Reference 2 Licensing Topical Report which stated that the current SRM and IRM systems provide sufficient monitoring during all design basis events. In Reference 3, the BWROG raised a number of issues which resulted from the NRC SER. At approximately the same time, Edison received the Reference 4 letter requesting that a schedule for installing an approved post-accident NFMS system at the BWRs be provided within 45 days. When it was determined (in the Reference 5 phone conversation) that all issues were not resolved between the BWROG and the NRC on this matter, the NRC Project Manager agreed to a delay in CECo's response until 30 days after receipt of the NRC letter clarifying its Reference 1 SER and resolving the issues which the BWROG identified in Reference 3. This clarification letter was sent to the BWROG on May 21, 1990 (Reference 6) and was received by CECo on May 30, 1990.

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The Reference 6 letter, however, did not totally resolve all the issues surrounding the installation of a post-accident NFMS at BWRs. Specifically, the letter requested the BWROG to develop a generic set of design criteria for post-accident neutron monitoring which would then be reviewed by the NRC Staff. Also, the Staff requested the BWROG to review the resolution of the issues and hopefully substantiate the NRC Staff judgement. In addition, it is CECo's understanding that the BWROG may appeal the Reference 1 NRC SER.

Based on the above information, Commonwealth Edison requests an extension for the submittal of a final response and schedule (if needed) for installation of a post-accident NFMS, until a resolution of all appeals and issues between the NRC Staff and the BWROG has been achieved. Should this upgrade continue to be required, this will permit Edison to develop an accurate six unit schedule based on design criteria endorsed by the NRC Staff.

CECo will provide an update on the NFMS issue within three months, if resolution has not yet been reached.

Please contact this office should further information be required.

Very truly yours,



T.J. Kovach  
Nuclear Licensing Manager

cc: A.B. Davis - Regional Administrator, RIII  
B.L. Siegel - Project Manager, NRR  
L.N. Olshan - Project Manger, NRR  
R.M. Pulsifer - Project Manager, NRR  
Senior Resident Inspector, Dresden  
Senior Resident Inspector, Quad Cities  
Senior Resident Inspector, LaSalle

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## REFERENCES

- 1) NRC letter (F.J. Miraglia) to BWR Owner's Group (S.D. Floyd), "BWR Owner's Group Licensing Topical Report, Position on NRC Regulatory Guide 1.97, Revision 3 Requirements for Post-Accident Neutron Monitoring System," (General Electric Report NEDO 31558), January 29, 1990.
- 2) BWR Owners Group letter (R.F. Janeczek) to NRC (T.E. Murley), "BWR Owner's Group Licensing Topical Report, Position on NRC Regulatory Guide 1.97, Revision 3 Requirements for Post-Accident Neutron Monitoring System," (General Electric Report NEDO 31558), April 1, 1988.
- 3) BWR Owner's Group letter (S.D. Floyd) to NRC (F.J. Miraglia), "Position on NRC Regulatory Guide 1.97, Revision 3 Requirements for Post-Accident Neutron Monitoring System (NMS)," February 21, 1990.
- 4) NRC letter (B.L. Siegel et.al) to Commonwealth Edison Company (T.J. Kovach), "Post-Accident Neutron Flux Monitoring Instrumentation to meet the Requirements of Regulatory Guide 1.97 for the Dresden, Quad Cities and LaSalle Stations," February 14, 1990.
- 5) Telephone Conversation between J.A. Silady (CECo) and B.L. Siegel (NRC) during the week of March 19, 1990.
- 6) NRC letter (W.T. Russell) to BWR Owners' Group (S.D. Floyd) "Position on NRC Regulatory Guide 1.97, Revision 3 Requirements for Post-Accident Neutron Monitoring System", May 21, 1990.