



UNITED STATES
ATOMIC ENERGY COMMISSION

WASHINGTON, D. C. 20545

August 8, 1974

Director
Office of the Federal Register
National Archives and Records Service
Washington, D. C. 20408

Dear Sir:

Attached for publication in the Federal Register are an original and two certified copies of a document entitled:

COMMONWEALTH EDISON COMPANY
Docket Nos. 50-237 and 50-249

DETERMINATION OF REQUEST FOR EXTENSION OF TIME
FOR SUBMITTAL OF EVALUATIONS REQUIRED BY ACCEPTANCE
CRITERIA FOR EMERGENCY CORE COLLING SYSTEMS (10 CFR SUBSECTION
50.46 (a)(2) (iii))

Publication of the above document at the earliest possible date would be appreciated.

Sincerely,

Paul C. Bender
Secretary of the Commission

Enclosures:

Original and 2
certified copies

bcc: ✓ Docket Clerk (Dir. of Reg.)
Information Services
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~~Comments~~

UNITED STATES ATOMIC ENERGY COMMISSION

DOCKET NOS. 50-237 AND 50-249

COMMONWEALTH EDISON COMPANY

DETERMINATION OF REQUEST FOR EXTENSION OF TIME
FOR SUBMITTAL OF EVALUATIONS REQUIRED BY ACCEPTANCE
CRITERIA FOR EMERGENCY CORE COOLING SYSTEMS (10 CFR

SUBSECTION 50.46(a)(2)(iii))

As required by 10 CFR subsection 50.46(a)(2), certain licensees must achieve compliance with acceptance criteria for emergency core cooling systems (ECCS) published in Appendix K to 10 CFR Part 50, by August 5, 1974, unless an extension of time for submission of the required ECCS performance evaluation and proposed Technical Specifications has been approved by the Director of Regulation pursuant to 10 CFR subsection 50.46(a)(2)(iii). As required by 10 CFR subsection 50.46(a)(2)(iii), a Notice was published in the Federal Register on July 11, 1974, (39 F.R. 25528) that the Director of Regulation had received and was considering a request from the Commonwealth Edison Company (the licensee) for an extension of time until October 5, 1974, of the submittal date for the Dresden Nuclear Power Station, Units 2 and 3 ECCS evaluations.

The Notice also invited the submission of views and comments by any interested persons on the licensee's request. Comments have been received from Friends of the Earth and Consolidated National Intervenors. These groups oppose the granting of that part of the requested extension of time to prepare an exemption request 45 days in advance of the extended submission date on the grounds that temporary derating cannot be considered as a basis for non-compliance with fundamental baseline regulations regarding reactor safety.

The Regulatory staff has taken into account these comments in the determination reflected herein. It should be noted that in making its determination the Regulatory staff did not take into account the licensee's request for additional time for the preparation of an exemption request.

In support of its request for an extension of time, the licensee states that it does not expect to receive the ECCS evaluation models and analyses from the General Electric Company (GE) for Dresden Units 2 and 3 before July 15, 1974. The licensee states that the requested extension will allow approximately two additional weeks to review the results of the analysis and develop appropriate Technical Specification changes. The basis for the remaining six weeks of the requested extension was to allow time for filing a request for exemption in the event that it became appropriate. (GE has indicated the evaluation models and analyses were transmitted to the licensee on July 22, 1974.)

It is evident from the licensee's request that the basis for an extension of time is the unavailability of the necessary evaluation models and analyses from GE. Since the promulgation of the regulation, the Regulatory staff has been engaged in a continuing effort to develop an AEC evaluation model which would meet the requirements of Appendix K of 10 CFR Part 50. A similar effort has been underway by the four vendors of nuclear steam supply systems for light-water nuclear power reactors, including GE. As the Regulatory staff recognizes from its efforts, this development work has involved a considerable amount of time. Based upon the Regulatory staff's experience and its knowledge of the efforts on the part of GE to develop adequate evaluation models and

analyses, the Regulatory staff believes that the licensee's statements regarding delay by GE in completing and submitting to it an evaluation model and analyses constitutes good cause for extension of the August 5, 1974 deadline for the submittal of the information required by 10 CFR Section 50.46. The Regulatory staff, however, does not believe the licensee has justified an extension of time until October 5, 1974. The Regulatory staff has independently developed a schedule of the steps and average times that should be sufficient for internal review by the licensee after transmittal by GE of GE evaluation and analyses to the licensee.

This schedule takes into account the review schedules submitted by all licensees who have requested extensions as well as the Regulatory staff's own views as to the minimum time which should be required to conduct the utility reviews and to prepare the necessary information for submittal to the Regulatory staff. The Regulatory staff's schedule is as follows:

1. Engineering review (including Q/A review) of evaluation models and analyses. (7 days)
2. Preparation of proposed Technical Specifications and revised operating procedures. (14 days)
3. Review by plant operations and nuclear safety committee and appropriate company nuclear review committee. (10 days)
4. Submit. (4 days)

Total Time: 35 days.

Based upon the above, the Regulatory staff has concluded that an extension of time of 35 days should be granted to the licensee commencing with the date of transmittal by GE of the GE model and analyses to the licensee. It should be noted that this licensee will be required to operate the Dresden Units 2 and 3 in accordance with limitations of the Interim Acceptance Criteria for ECCS during the period of the time extension granted herein.

Accordingly, based on the foregoing considerations and for good cause shown, the Director of Regulation hereby grants an extension of time to the licensee which extends the date for compliance with the requirements of 10 CFR subsection 50.46(a)(2)(ii) from August 5, 1974, until August 26, 1974.

Dated at Bethesda, Maryland, this *5th day of August, 1974.*

FOR THE ATOMIC ENERGY COMMISSION


Edson G. Case
Acting Director of Licensing