



Regulatory Docket File

Commonwealth Edison

One First National Plaza, Chicago, Illinois

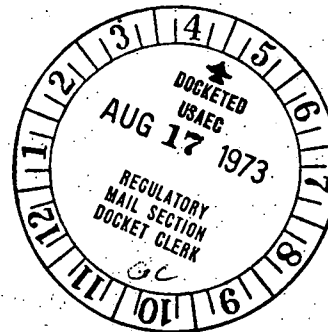
Address Reply to: Post Office Box 767

Chicago, Illinois 60690

50-249

August 10, 1973

Mr. B. J. Youngblood, Chief
Environmental Projects Branch 3
Directorate of Licensing
U.S. Atomic Energy Commission
Washington, D.C. 20545



Subject: Dresden Draft Environmental Statement,
AEC Dkts 50-237 and 50-249

Dear Mr. Youngblood:

We have reviewed the Staff's draft environmental statement concerning Dresden Units 2 and 3. Our comments are attached. In several areas, the Staff has recommended that certain steps be taken to prevent or mitigate possible environmental effects from the operation of these Units. In some, if not all, of these areas including, for example, the prevention of danger due to fog on County Line and Dresden roads, we have already taken action. In such cases, these comments discuss the steps taken. We believe that they will be satisfactory.

In our review of this statement, we have become concerned about the suggestions for environmental technical specifications for two reasons. First, we believe this level of detail is inappropriate in the environmental statement since the development of such specifications requires careful attention to the operating requirements of the plant. In this regard, we would point out that the environmental statement is somewhat similar to the Staff's safety evaluation which does not attempt to incorporate all the matters set forth in the technical specifications and the FSAR. We believe that the Staff's review of Commonwealth Edison's proposed environmental technical specifications, which will be submitted in September of this year, will provide the appropriate opportunity to develop mutually acceptable specifications in those areas where such limitations are actually required and do not duplicate restrictions imposed by other agencies. In addition, we believe it inappropriate to burden the specifications themselves with the level of detail

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Commonwealth Edison Company

Mr. B. J. Youngblood

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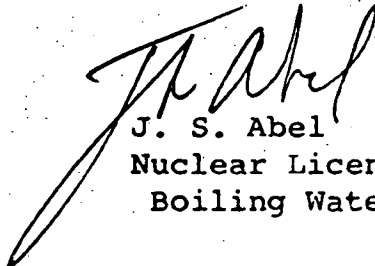
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implied in the draft environmental statement. There are many areas which may be appropriately covered by written procedures to be changed from time to time with changing conditions. Such procedures are, of course, subject to inspection by the Commission's Directorate of Regulatory Operations to insure their presence and adequacy.

I am convinced that the scope of environmental technical specifications can be determined during your review of our proposed technical specifications in a way which satisfies the Commission's concern over undue environmental effects, a concern shared by Commonwealth Edison Company, while allowing our operators necessary flexibility.

In addition to this signed original, 39 copies of these comments are attached.

Very truly yours,



J. S. Abel

Nuclear Licensing Administrator -
Boiling Water Reactors