

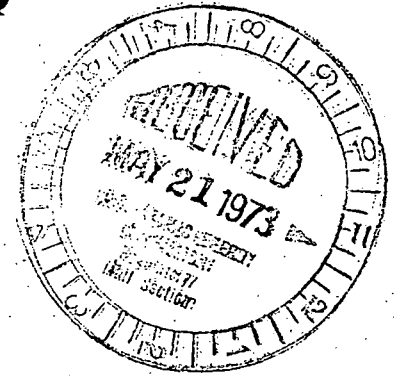


**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

Regulatory

File Cy.

May 18, 1973



Mr. A. Giambusso  
Deputy Director for  
Reactor Projects  
Directorate of Licensing  
U. S. Atomic Energy Commission  
Washington, D. C. 20545

Subject: Response to Request for Overdue Items on the  
Dresden Dockets 50-10, 50-237 and 50-249

Dear Mr. Giambusso:

Your letter of May 4, 1973 listed a number of requests for information for Dresden Units 1, 2 and 3 to which responses were overdue as well as for responses which are still pending. Attachment A to this letter outlines the status of each item listed as Overdue Responses in Attachment A of your letter. Replies have been submitted for four items listed for Dresden Unit 1. A response for the remaining item will be submitted next week. Of the eight items listed for Dresden Units 2 and 3, replies have been submitted for six items. Replies to the two remaining items (#4 and 8) will be expedited as explained in Attachment A. Attachment B to this letter gives a status report for each of the items listed as Additional Pending Responses in Attachment B to your letter.

It has always been Commonwealth Edison's intent to respond to requests for information from the Atomic Energy Commission as quickly as possible. Our ability, including our consultants', to meet dates specified by the AEC which have short lead times has been hampered by the ever-growing number of generic questions being asked by the Commission as well as reevaluations resulting from changes in safety guides, criteria, and regulations. We have attempted to respond to this demand by establishing priorities to the various issues and increasing our staff.

Where dates have been specified by Commonwealth Edison, we have attempted to establish tight schedules which we believed to be in the best interests of Edison as well as the Commission. Establishment of schedules in this manner inevitably leads to late submittals. We have had discussions with the Commission over the past two years concerning the review procedures established in our technical specifications for many of our submittals. We believe the revisions which are now in effect at Zion and Quad-Cities and will hopefully be put into effect at Dresden in the near future, will expedite the necessary reviews and make our submittals more timely. We will impress upon our engineering and production departments, as well as our consultants, the importance

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Commonwealth Edison Company

Mr. A. Giambusso

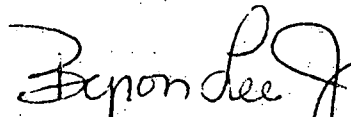
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of timely responses to your scheduling as well as our operations. In addition, we will establish a program in this office of periodic review of commitment dates and will notify you of any slippage in our schedules as soon as they become evident.

I believe the Commission must also review the times allowed for response, giving consideration to various reasons for delay including the U.S. mail. Your letter of May 4, 1973 specified submittal of information within 15 days of the date of the letter. We did not receive your letter until May 11. Half of the time allotted for response was already passed.

Sincerely,



Byron Lee, Jr.  
Vice-President

Att.

## Commonwealth Edison Company

## ATTACHMENT A

Overdue ResponsesDresden 1:

1. The conceptual design of the Dresden Unit 1 High Pressure Coolant Injection System was submitted on May 17, 1973 as Dresden Special Report No. 27. The April 6, 1973 date was not met because review of the conceptual design by the various review groups within the Commonwealth Edison Company and their suggested modifications required more time than originally scheduled.
2. A review of this problem has been instituted and a preliminary statement on our evaluation to date will be submitted in the week of May 21, 1973.
3. The review of revisions by the Dresden Station Review Board and the Commonwealth Edison Nuclear Review Board was complete on May 15, 1973. The proposed Technical Specifications were submitted on May 17, 1973. The various reviews required for this submittal took longer than originally scheduled.
4. This information was submitted as Supplement A to proposed Change to Appendix A, DPR-2, dated May 4, 1973.
5. The response was submitted on May 15, 1973. Review of the initial response resulted in a need for additional information from the appropriate engineering groups and the station. This delayed the submission date.

Dresden 2 and 3:

1. The remaining responses were submitted as Supplement 3 to Special Report 14, dated April 30, 1973. Informal discussions with your staff now indicate that our reply will not satisfy your latest concerns. Our discussions with your staff resulting from your letter of November 14, 1972 led us to believe that modifications and procedures submitted for Browns Ferry were acceptable. This is what we submitted and it is consistent with Safety Guide 7. We have now been told that the new standard is the Duane Arnold submittal. We are now attempting, with our vendor, to review the Duane Arnold response for applicability to Dresden Units 2 and 3 and Quad-Cities Units 1 and 2. We hope to respond to your staff early in June, 1973.
2. The fuel quality assurance program was submitted on May 16, 1973. The fuel quality assurance program required formalization. It was then reviewed extensively by the various

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Commonwealth Edison review departments involved. The stated schedule was overly optimistic in view of several modifications which were required as a result of the various reviews.

3. This response was submitted as Dresden Station Special Report No. 24 dated April 27, 1973. This report required information from our consultants. Their original submittal of information was incomplete. Receipt of this additional information, required review and refinement prior to submission took longer than anticipated.
4. It is now expected that this report will be submitted to the Commission by September 30, 1973. These tests were developed by the reactor manufacturer and Edison to provide data to further refine the reactor stability models. In view of other commitments, this report has been assigned a lower priority.
5. Our response was contained in Dresden Special Report No. 25, dated May 2, 1973. This response is a generic type document furnished by the General Electric Company. The time specified in your February 2, 1973 letter did not allow adequate time to compile and review the submittal. Edison should have requested an extension.
6. The Dresden Unit 3 Startup Test Report was submitted as Dresden Special Report No. 26, dated May 4, 1973. The results of these tests were reviewed by Region III Regulatory Operations as the tests were performed. Therefore, the formal report preparation was assigned a lower priority.
7. This information was submitted as Supplement A to Proposed Modification 73-2 for Dresden Units 2 and 3, dated May 1, 1973. This information was submitted as General Electric proprietary information. However, further discussion with the General Electric Company has resulted in a release from the proprietary requirement and therefore Commonwealth Edison hereby withdraws the request for proprietary consideration of the information on the hydrogen getter submittal on May 1, 1973.
8. The General Electric generic report on this subject was submitted to the Commission on May 11, 1973. Once this report is received by Commonwealth Edison, it will be reviewed and a response forwarded to the Commission. It

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is anticipated that our report can be submitted one month after receipt of the General Electric report. Edison's submittal date was based upon receipt of the generic report in March, 1973. Edison should have notified the Commission of the delay in completion of the generic report.

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## ATTACHMENT B

Additional Pending ResponsesDresden 1:

1. The Dresden Unit 1 augmented off-gas system program was submitted on May 14, 1973.

Dresden 2 and 3:

1. On May 1, 1973 Supplement A to Modification 73-2 of the Final Safety Analysis Report was submitted with regard to start-up of Dresden Unit 3. Results of additional evaluation of the scram reactivity curve with the reloaded core for periods later in the cycle will be forwarded in accordance with that submittal.
2. July 1, 1973 is still our target for submittal.
3. The index of the Dresden Units 2 and 3 licensing documents will be submitted by June 15, 1973.
4. The revised Quad-Cities Technical Specifications, Section 6, was put into operation on May 15, 1973. A similar submittal for Dresden Units 1, 2 and 3 will be forwarded to the Commission by August 15, 1973.
5. The schedule for submitting the final report concerning the safety valve studies remains September 1, 1973.
6. The safety and relief valve reaction force stress analyses are complete and the draft reports are being prepared. Unless review of the draft requires unusual reevaluation, the report should be submitted during the week of June 4, 1973.
7. The generic report on the results of the torus testing at Quad-Cities Station was submitted by General Electric on May 11, 1973. Our reply to your request, based on the generic report, is expected to be submitted by June 15, 1973.
8. Our reply for Dresden Station was submitted on May 2, 1973.
9. A meeting has been held with the AEC staff concerning the cask drop accident analysis for Dresden Units 2 and 3 and a written response will be submitted early in June, 1973. Use of the spent fuel shipping cask is now scheduled for mid-July, 1973.

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10. A reply to your letter of May 2, 1973, regarding rod worth minimizer should be submitted by June 15, 1973. This is 14 days beyond the 30-day requirement of your letter. We request an extension to June 15, 1973, to allow adequate time to consult all interested parties, make an adequate review of their comments and suggestions, and prepare a formal response.