

# Commonwealth Edison Company

ONE FIRST NATIONAL PLAZA ★ CHICAGO, ILLINOIS

Address Reply to:

POST OFFICE BOX 767 ★ CHICAGO, ILLINOIS 60670

August 18, 1969



Dr. Peter A. Morris, Director  
Division of Reactor Licensing  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Subject: Amendments 18 and 19 to the applications for construction permits and operating licenses for Dresden Units 2 and 3 filed under AEC Dkts 50-237 and 50-249, respectively

Dear Dr. Morris:

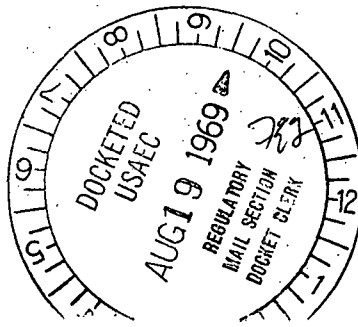
The applications for construction permits and operating licenses for Dresden Unit 2, filed April 14, 1965 in AEC Dkt 50-237, and for Dresden Unit 3, filed February 10, 1966 in AEC Dkt 50-249, are hereby amended by submission of Amendment 18 for Dresden Unit 2 and Amendment 19 for Dresden Unit 3.

These amendments which should be inserted in Volume VI consist of information on the cost and schedule associated with modifying the Rod Block Monitor System to make it conform to the requirements of IEEE 279.

General Electric and Commonwealth Edison consider these amendments to be confidential proprietary information and, therefore, it is requested that the Commission withhold Amendments 18 and 19 from public disclosure in accordance with 10 CFR 2.790(b).

It is believed that public disclosure of these amendments is not required in the public interest and that public disclosure would adversely affect to a serious degree the interests of General Electric Company. The schedule and cost information contained in these amendments is not at all necessary for a determination of the safety implications regarding the presence or absence of the rod block monitor in the plant. For this purpose, descriptive technical information regarding the function of the rod block monitor is completely adequate, and such information has been supplied in Amendments 17 and 18 to Dockets 50-237 and 50-249, respectively.

Public disclosure of this information would adversely affect General Electric Company in the following manner:



2645 x

Dr. Peter A. Morris

- 2 -

August 18, 1969

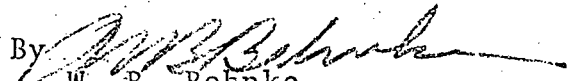
The schedule and cost estimate information is only preliminary due to the present nonexistence of firm design and construction details. Disclosure of this information would have serious business implications to the General Electric Company, the supplier of the plant. Unfavorable public reaction would be unwarranted at this time since the Commission as of this date has not determined that the rod block monitor is required to be incorporated in the plant. The submittal of the information in these amendments is solely to assist the Commission in determining the desirability of application of this feature.

It is believed that withholding Amendments 18 and 19 from public inspection is not contrary to the public interest. The regulations of the AEC contained in 10 CFR 2.790(b) provide that the withholding of information from public inspection does not "affect the right of persons properly and directly concerned to inspect the document." Thus, Section 2.790(b) by its terms, recognizes a distinction between the right of the public at large and that part of the public which is "properly and directly concerned." In view of the fact that Section 2.790(b) fully protects the interest of persons properly and directly concerned, it is submitted that the public interest test established by the third sentence of Section 2.790(b) can relate only to the interest of members of the general public who have not made a showing that they are properly and directly concerned.


In addition to three signed originals, 32 copies of these amendments are forwarded herewith. If additional copies are required, they will be made available.

Very truly yours,

COMMONWEALTH EDISON COMPANY

By   
W. B. Behnke  
Assistant to the President

SUBSCRIBED and SWORN to  
before me this 18<sup>th</sup> day  
of August, 1969.

  
Notary Public

DOCKET: 50-237-249

Date: 8-19-69

NOTICE TO AEC PUBLIC DOCUMENT ROOM

The following transmitted with letter from Commonwealth Edison Co.  
dated 8-18-69 is being withheld from public disclosure in accordance  
with Section CFR 2.790

Amendments 18 and 19, dated 8-18-69

Frank E. Logan  
Reg. files