



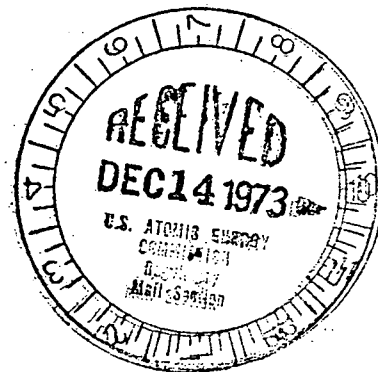
**Commonwealth Edison**  
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 Address Reply to: Post Office Box 767  
 Chicago, Illinois 60690

Regulatory

File Cy.

December 10, 1973

Mr. Angelo Giambusso  
 Deputy Director for  
 Operating Reactors  
 Directorate of Licensing  
 Office of Regulation  
 U.S. Atomic Energy Commission  
 Washington, D.C. 20545



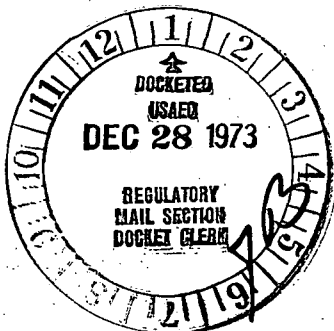
Subject: Dresden and Quad-Cities Stations Anticipated  
 Transient Without Scram - AEC Dkts 50-10,  
 50-237, 50-249, 50-254 and 50-265

Dear Mr. Giambusso:

In response to your letter dated October 19, 1973, we are advising you of the approach we intend to take in addressing the subject. Dresden Station Units 1, 2 and 3 and Quad-Cities Station Units 1 and 2 will be analyzed in accordance with AEC Technical Report WASH-1270, Appendix A, Section II C, and reports will be submitted by October 1, 1974.

Commonwealth Edison Company believes that a failure to scram is an incredible event and does not warrant consideration by the AEC. This conclusion is based on the following:

1. The diversity and performance of the General Electric boiling water reactor scram system, including both protection systems and actuator system functions have been designed with special emphasis on the extremely high integrity and reliability of the total protection function such that it is virtually incapable of failure.
2. The diversity and reliability of the scram instrumentation are such that should a particular scram signal experience a common mode failure, in itself a highly unlikely event as shown in GE report NEDO-10189, there are other scram signals taken off different parameters which will initiate reactor scram. For example, on Dresden 2 and 3 and Quad-Cities 1 and 2,



Mr. A. Giambusso

- 2 -

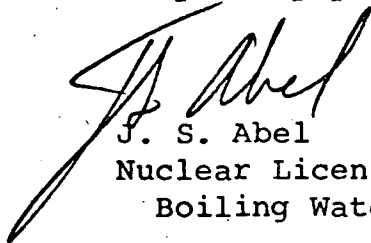
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for a turbine trip, three separate functions would scram the reactor; stop valve closure, high neutron flux, or high reactor pressure.

3. Each control rod is scrammed by a separate control rod drive and drive module which contains an independent accumulator to provide the energy necessary to scram the control rod.
4. Frequent and exhaustive testing of scram instrumentation and control rod drives is carried out in accordance with the Technical Specifications. Such testing would indicate any trend of potential common failure in the system.

Our position concerning this matter has been stated previously in Amendment 24 to the Dresden Unit 3 Final Safety Analysis Report and Amendment 23 of the Quad-Cities Units 1 and 2 Final Safety Analysis Report.

Very truly yours,



J. S. Abel  
Nuclear Licensing Administrator  
Boiling Water Reactors