



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767  
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May 20, 1980

Mr. H. R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: BWR-4/5 Licensing Review  
EXCOM LTR 80-02

Reference (a): C. Reed letter to H. R. Denton (EXCOM Ltr.  
80-01) dated May 7, 1980

Dear Mr. Denton:

As indicated in Reference (a), the utility owners of six boiling water reactor facilities are engaged in an effort to delineate the open issues which are common to each docket, and to define to the extent practicable a common basis for solving those issues. It is the intention of this group to maintain a strong liason with your staff to promote the expeditious resolution of common issues, and to assure the uniform application of the bases for resolution on each participating docket.

A meeting with your staff was held on May 14, 1980 to discuss in greater detail the mechanics by which these objectives will be achieved. As indicated in Attachment 1, the staff endorsed on May 1 and affirmed on May 14, the approach for reviewing common licensing issues proposed by the BWR-4/5 Licensing Review Group, indicating that the approach is feasible and should be encouraged. In that regard, the staff reiterated its belief that technical issues for which adequate closure bases exist and are already documented will not be reopened unless a new safety issue effecting these bases is identified and its applicability evaluated by your Division of Safety Technology. This represents a key element of the program to provide a common solution for open issues, and is of particular interest to those participating utilities on whose docket many issues were resolved prior to the development of this group review program.

The program will, as was discussed on May 14, require the cooperation of each participating utility in the development of common solutions to issues. It will also demand a reinforced discipline on the part of your staff in the review and closure of issues on all participating dockets. The utility owners will

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Commonwealth Edison

Mr. H. R. Denton, Director  
May 20, 1980  
Page 2

satisfy their self-imposed mandate by working closely together to assess the commonality of issues, to apply documented closure bases to those issues, and to develop common solutions to the remaining common issues. Your staff can satisfy its legal mandate and contribute to the success of the BWR-4/5 review effort by allocating adequate resources to the review of common BWR issues, by coordinating through the Technical Branch Monitors the resources allocated by the National Laboratories to these common issues, and by promoting a better communication of review closure bases within the Division of Project Management. It is our expectation, based on the discussion of May 14, 1980 that both the owners and the NRC Staff are committed to the success of this effort. Although it may be impossible to provide common solutions for all common issues, both your resources as well as our own will be conserved by making every effort to find some "least common denominator" for all the plants.

In order to maintain the momentum now generated by this "common review" effort, your staff made the following commitments:

1. Provide a current Open Items list on participating dockets - Target: May 23, 1980.
2. Provide the Lead Plant (BWR) License Review Schedule - Target: June 6, 1980.
3. Future Meeting Schedule
  - (a) Existing closure basis discussion - Target: June 12, 1980.
  - (b) Reactor Systems Branch discussion - Target: June 13, 1980.
  - (c) Instrumentation and Control Systems Branch discussion - Target: late June, 1980.
  - (d) TMI Requirements Review - ASAP (Target - early June, 1980).

The schedules listed above are admittedly ambitious; but both the owners and your staff recognize the need to reinitiate in earnest the review of the lead BWR plant (LaSalle County Unit 1), for which the NRC Staff forecasts a fuel load date of December, 1980. This is particularly true of the review of TMI related requirements on which minimal discussion has yet to take place for this group of plants.

In the future, communications from the executive committee of this group will be directed primarily to Mr. D. Eisenhut. Communications at the working group level will be directed to Mr. J. Wilson, who is to coordinate the NRC Project Management activities

Commonwealth Edison

Mr. H. R. Denton, Director  
May 20, 1980  
Page 3

with this group for Mr. R. Tedesco.

If I can be of any assistance in clarifying our planned activities, or if you have any suggestions on the program we have outlined, please contact me. We encourage your continued support, and solicit your assistance in finalizing the schedule of future meetings outlined in this letter.

Very truly yours,

*C. Reed*

Cordell Reed  
Vice-President

cc: Messrs. E. Borgman - Cincinnati Gas & Electric Co.  
N. Curtis - Pennsylvania Power & Light Co.  
H. Tauber - Detroit Edison Co.  
R. Renberger - Washington Public Power Supply System  
A. Wofford - Long Island Lighting Company  
Dr. G. Sherwood - General Electric Co.  
R. Boyd - KMC Inc.

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Attachment 1INITIAL NRC RESPONSE

NRC MANAGEMENT IS IN FAVOR OF OUR APPROACH BECAUSE OF:

- EISENHUT/ROSS REACTIONS TO NTOL LICENSING APPROACH DISCUSSED IN PHOENIX (5/1/80)
  - ZIMMER SER (IS) ACCEPTABLE BASIS
  - LEAD PLANT SER APPROACH IS FEASIBLE
  - COMMON APPROACH TO RESOLVING ISSUES IS ENCOURAGED
  - NO NEW ISSUES WITHOUT PRIOR SAFETY/ TECHNOLOGY DIVISION REVIEW.
  
- IDENTIFICATION OF NRC COORDINATOR TO WORK WITH UTILITY COORDINATOR
  
- OUR APPROACH
  - CONSERVES RESOURCES
  - EXPEDITES LICENSING PROCESS
  - STABILIZES THE PROCESS