



**Commonwealth Edison**  
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September 16, 1986

Mr. J. A. Zwolinski, Director  
BWR Project Directorate No. 1  
Division of BWR Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3  
Quad Cities Station Units 1 and 2  
Mark I Containment Combustible Gas  
Control  
NRC Docket Nos. 50-237/249 and 50-254/265

Reference: Letter from R. M. Bernero to D. L. Farrar  
dated August 11, 1986.

Dear Mr. Zwolinski:

The referenced letter documented the NRC's recent conclusion that Commonwealth Edison must either (a) provide recombiners or (b) provide a purge/nitrogen repressurization system at Dresden and Quad Cities to achieve conformance with 10 CFR 50.44 and Generic Letter 84-09. This conclusion is apparently a result of the staff's determination that the Air Containment Atmosphere Dilution (ACAD) systems at Dresden and Quad Cities represent potential post-LOCA oxygen sources as described in Criterion 3 of Generic Letter 84-09.

As a result of your letter, we have been actively reviewing 10 CFR 50.44, the generic letter, the historical correspondence regarding this issue and the staff position stated in the reference in order to determine the most appropriate and prudent course of action. We have also contacted other utilities who've received similar letters and discussed the issue with the Dresden and Quad Cities Project Managers.

As a result of our efforts, we have determined that it would not be appropriate to commit to either of the modifications identified in the referenced letter at this time. We request additional time to continue our evaluation of the technical and regulatory basis for the staff's position and to evaluate other options for resolving this issue.

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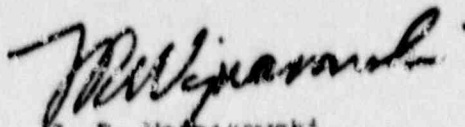
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We request a meeting with the appropriate staff personnel to discuss this issue in detail to assure we fully understand the staff's rationale for determining that the specific modifications identified in the referenced letter are necessary. This meeting would provide the opportunity to fully evaluate other alternatives for resolving NRC concerns without resorting to plant modifications.

If you can accommodate our request for a meeting, please have the Dresden and/or Quad Cities Project Manager contact this office to arrange a schedule. An AdHoc Committee of the BWR Owners Group has recently been formed to address this issue and is planning to meet in early October. I suggest the above-requested NRC meeting be held subsequently.

Very truly yours,



J. R. Wojnarowski  
Nuclear Licensing Administrator

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cc: R. Gilbert - MRR  
E. Bevan - NRP  
NRC Resident Inspector - Quad Cities  
NRC Resident Inspector - Dresden