

Commonwealth Edison Company

ONE FIRST NATIONAL PLAZA * CHICAGO, ILLINOIS

Address Reply to:

POST OFFICE BOX 767 * CHICAGO, ILLINOIS 60690

February 15, 1973

Mr. Boyce H. Grier, Regional Director
U. S. Atomic Energy Commission
Directorate of Regulatory Operations
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Grier:

Your letter of June 29, 1972 requested verification that valves important to safety installed or to be installed at our Zion, Quad-Cities and Dresden facilities met minimum wall thickness requirements specified by applicable codes, standards and procurement specifications. We responded on August 14, 1972. On September 13, 1972, you requested more information. Following an industry meeting in Washington at which the subject was discussed, we submitted a program for our Zion Station on December 22, 1972. The inspection of Unit 1 valves is nearing completion. All valves six inches and larger (120 valves) have been checked and meet design specifications. Inspection of 86 of the 161 valves under six inches has been completed and all were found to be acceptable. The inspection of Unit 2 valves is now in progress and 44 valves have been completed.

In our letter of August 14, 1972, we described a program based on ultrasonic testing of a sample of the valves important to nuclear safety in our Quad-Cities Unit 2. No deficiencies were found in that review either. We believe this type of program gives reasonable assurance that required valve wall thicknesses have been maintained for such valves in both the Quad-Cities units and in Dresden Station Units 2 and 3. We chose this program because we believe the benefits gained by field testing all valves in an operating plant were outweighed by the costs of providing this additional data. We estimate at least 50 man-rem per unit exposure will be received by employes, on the average, for each of the four units involved. The radiation burden involved in doing the tests on Dresden Unit 1 is estimated to be at least several times that for any

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Mr. Boyce H. Grier

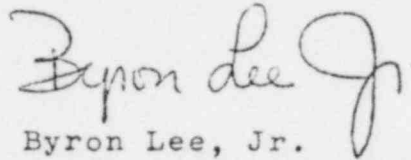
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one of our other four operating BWR units. Using available data, we estimate the radiation dose involved in testing 27 of the 116 valves involved to be 143 man-rem of exposure. We believe this exposure is inconsistent with the policy of keeping exposures as low as practicable.

We are presently formulating a program for our five operating units based on our experience to date and the potential exposure problems relating to operating reactors. We expect to have this program formalized and submitted to you by the end of March.

Very truly yours,

A handwritten signature in cursive script that reads "Byron Lee Jr." The signature is written in dark ink and is positioned above the typed name.

Byron Lee, Jr.
Assistant to the President