

JUL 15 1975

Docket No. 50-10

Commonwealth Edison Company
ATTN: Mr. J. S. Abel
Nuclear Licensing Administrator -
Boiling Water Reactors
Post Office Box 767
Chicago, Illinois 60690

Gentlemen:

This is in response to your request, dated June 18, 1975, for an extension of time from August 2, 1975 to August 29, 1975 for submission of an ECCS evaluation for the Dresden facility's conformance with the requirements of 10 CFR 50.46(a)(2)(ii). Your letter indicates that by August 2, 1975 you will be able to complete an ECCS analysis for the facility in its present configuration, which requires reliance on systems not fully conforming to the single failure criterion and assumes that offsite power is available. This is consistent with the letter from Mr. Allred of the General Electric Company to you dated June 17, 1975 in which Mr. Allred indicates that the "as is" analysis, evaluating the Dresden 1 ECCS performance without the proposed high pressure coolant injection system (HPCI), will be completed by June 27, 1975. You indicated that you intend to submit an additional analysis demonstrating that Dresden 1 will be in full compliance with Appendix K after the installation of the proposed HPCI system and other related modifications to the present ECCS system. You estimate that installation of these modifications will take at least 2 years to complete. In the interim period you will not be in full conformance with the requirements of 10 CFR 50.46. Therefore, your letter of June 18, 1975 to the Secretary of the Commission requested an exemption from the Commission with respect to the requirement for diversity of emergency systems or diversity of emergency power sources.

Your June 18, 1975 letter to me indicates that the ECCS analysis for the modified facility will not be completed by August 2, 1975. Accordingly, you requested an extension of time until August 29, 1975 for submittal of the evaluation of conformance with the final acceptance criteria for emergency core cooling systems. Our Determination of April 3, 1975, and the prior Determinations of August 5, 1974 and June 28, 1974, were directed toward an analysis of conformance with 10 CFR 50.46 for the plant in its present configuration. This analysis would uncover the need for modification

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of operating conditions or systems modifications if any were required. You have apparently determined that some modifications are required to wholly conform to the single failure considerations of the Commission's Acceptance Criteria, and have requested an exemption from the Commission which is presently under consideration.

Since your letter indicates that you will be able to complete your evaluation of the system as presently installed by August 2, 1975, no extension of time is required. If the Commission grants your exemption, your August 2, 1975 analysis will satisfy our requirements. If your exemption is not granted, any further facility operation must conform to the requirements of the Commission rules.

Your additional analysis of ECCS performance with the proposed system modifications is an important element of demonstrating that you are taking every reasonable effort to achieve compliance with 10 CFR 50.46 at the earliest opportunity. In this connection, submittal of this additional analysis for our review by August 29, 1975 is acceptable.

This letter confirms our telephone conversation with Mr. James Abel of your staff on July 8, 1975, in which we informed him that your proposed submittal of the evaluation of the existing Dresden 1 systems will satisfy the requirements of 10 CFR 50.46 relating to a timely submittal and, therefore, no extension of time for your submittal is necessary and is withdrawn.

Sincerely,

Original signed by:
Karl R. Goller

Karl R. Goller, Assistant Director
for Operating Reactors
Division of Reactor Licensing

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cc:

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