



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

March 31, 1982

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Quad Cities Units 1 and 2  
High Density Fuel Rack  
Modification - Neutron  
Attenuation Testing  
NRC Docket Nos. 50-254/265

Reference (a): B. Grimes letter to All Power  
Reactor Licensees dated April 14,  
1978.



Dear Mr. Eisenhut:

Commonwealth Edison has recently reviewed the Reference (a) "OT Position for Review and Acceptance of Spent Fuel Storage and Handling Application" requirement to confirm the presence of strong absorber material in new high density storage racks (refer to page III-3 of Reference (a)). For the high density racks intended to be used at Quad Cities Station Units 1 and 2, we have determined that this verification test may be more efficiently performed at the manufacturer than at the site. Specifically, (1) this alternative would have less impact upon refueling outage preparations because fuel handling personnel and the reactor building crane will not need to be employed for this testing, and (2) this approach would result in a net reduction in personnel radiation exposures because work will be performed in lower background areas and with less interruption.

Considering the above, Commonwealth Edison intends to confirm the presence of strong absorber in the new Quad Cities spent fuel racks by performing verification tests at the manufacturer or at the Quad Cities site that will show within 95 percent confidence limits that there is a sufficient amount of neutron absorber in the racks to maintain the neutron multiplication factor at or below 0.95. This approach has been discussed with the NRC Quad Cities Project Manager and we understand that there should be no concerns with your staff.

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D. G. Eisenhut

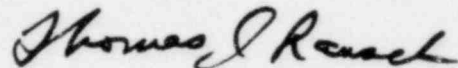
- 2 -

March 31, 1982

Please address any questions you may have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this transmittal have been provided for your use.

Very truly yours,



Thomas J. Rausch  
Nuclear Licensing Administrator

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cc: Region III Inspector - Quad Cities

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