



**Commonwealth Edison**  
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December 17, 1982

Mr. Cecil O. Thomas, Acting Chief  
Standardization & Special Projects Branch  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

SUBJECT: Zion Station Units 1 and 2  
Fuel Management Topical Report  
NRC Docket Nos. 50-295 and 50-304

REFERENCES: (a): September 16, 1982 letter from C. O. Thomas to F. G. Lentine.  
(b): July 9, 1982 letter from F. G. Lentine to H. R. Denton.

Dear Mr. Thomas:

In Reference (a), you expressed concern about an excessive slippage in Commonwealth Edison's schedule for submitting the proposed subject topical report for review and approval by NRC Staff. For discussion purposes, the revised schedule from Reference (b) is included as Attachment 1 to this letter. Attachment 1 illustrates the original schedule dates presented at the May 12, 1981 meeting as well as the more recently (July 9, 1982) revised dates. As you correctly noted, the review period for the subject report was reduced from thirteen (13) to five (5) months. Such a revision was discussed and agreed to by the Staff at the original May 12, 1981 meeting. The basis for that agreement follows.

- 1) Commonwealth Edison is seeking approval for neutronic methods only; hence, only the Core Performance Branch needs to review the report.
- 2) At Staff suggestion, Commonwealth Edison agreed to make a summary presentation to Staff of details of benchmarking results and proposed topical contents prior to topical submittal. Such a presentation would provide Commonwealth Edison direct Staff feedback/comments on completeness and acceptability of proposed report, thus precluding an extensive question/answer (Q/A) period. (This was reason for additional four (4) months allotted in revised schedule between Summary Presentation and Topical Submittal).
- 3) Staff indicated that if Items 1) and 2) hold, only five (5) months would be necessary for review and approval.

This understanding was reconfirmed and agreed to by Mr. D. B. Fieno of your Core Performance Branch via a telecon with Dr. W. F. Naughton of our Nuclear Fuel Services (NFS) Department in early October 1982. Thus, Commonwealth Edison again requests the Staff's concurrence or comments as soon as possible on the revised schedule of Attachment 1.

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Regarding your concern on a "50.59" letter submittal for Zion Unit 1 Cycle 8, it is Commonwealth Edison's understanding that the submittal and approval of the subject topical report is required prior to a "50.59" letter being adequate for referencing our methodology. We intend to comply with this understanding. Specifically, for the Zion Unit 1, Cycle 8 reload, Commonwealth Edison plans on doing the following:

- 1) Submit a Transition Licensing Document early in 1983 for Staff approval which will cover the transition of Westinghouse 15x15 fuel assemblies to the Westinghouse 15x15 Optimized Fuel Assembly (OFA);
- 2) Submit for Staff approval the subject topical report on Commonwealth Edison neutronic methodology; and
- 3) Submit a normal "50.59" letter referencing Items 1) and 2) and covering other aspects of the reload as in past "50.59" letters for the Zion units.

Further discussion of this subject may be appropriate at our proposed January 1983 meeting.

Please address any questions regarding this matter to this office.

Very truly yours,

*F. G. Lentine*

F. G. Lentine  
Nuclear Licensing Administrator

FGL:WEN:lm  
ID:0439N

Attachment

ATTACHMENT 1

Schedule For Implementation  
of  
CECo PWR Fuel Management Program

<u>Event</u>	<u>Original Date</u>	<u>Revised Date</u>
CECo meets with NRC to discuss Fuel Management plans and Topical Report	5/81	-
CECo Design Tasks commence on Zion 1 Cycle 8	11/81	5/82
CECo Summary presentation to NRC of Topical <sup>+</sup> Results	3/82	1/83
CECo PWR Methodology Topical submitted to NRC for review	3/82	5/83
CECo Topical referenced in CECo Reload "50.59" letter to NRC for Zion 1, Cycle 8	1/83	7/83
NRC Approval of CECo Topical	4/83	10/83

+ Specifically, parameters benchmarked, results of benchmarking, and statistical analyses will be presented.