



Commonwealth Edison
1400 Opus Place
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USNRC
OFFICE OF ADMINISTRATION

Chief, Regulatory Publications Branch
Division of FOI and Public Service
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

This letter provides Commonwealth Edison's (CECo) comments on the Nuclear Regulatory Commission's (NRC) elimination of requirements important to safety from 57 Federal Register 4166 dated February 4, 1992. This letter specifically comments on the section related to increasing the allowable containment leakage rates. CECo believes that such an increase would result in a major savings to the Station's operating and maintenance costs and would have an effect on the pending rule change to 10 CFR 50, Appendix J. But the Federal Register notice does not clearly identify what is being proposed.

All CECo plants use allowable leakage rates based upon WASH-1400 source terms which assumes conservative weather conditions and direct leakage of nuclides from primary to secondary containment. The NUREG 1150 recalculated the source terms with a factor of ten reduction in offsite dose rates from the WASH-1400 results. This report did not assume direct leakage of the containment atmosphere. As a result of reviews by both the NRC and ANS, sufficient technical basis now exist to utilize the recalculated source terms. Is the NRC now considering the use of the methodology based upon the NUREG 1150 source terms? If this is the case, then it would be possible to recalculate the station's 10 CFR 50 dose rates using the new source terms and justify an increase in containment leakage rate.

It appears that the NRC is considering whether to use containment leakage rates based on either 1) post accident offsite dose rates or 2) the lowest reasonably achievable leakage rates practical. The latter would result in a continued large expenditure of resources and personnel dose rates with no resulting increase in public safety.

Please direct any questions you may have to this office.

Respectfully,

Marcia Jackson

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Generic Issues Administrator

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