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June 29, 1998

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Dresden Nuclear Power Station Unit 1
Decommissioning Program Plan Update
NRC Docket No. 50-010

References: 1) June 1, 1998 letter from R. P. Tuetken (ComEd) to U.S. NRC
2) December 19, 1996 letter from J. S. Perry (ComEd) to U.S. NRC

In accordance with 10 CFR 50.71(e)(4), Commonwealth Edison (ComEd) is submitting the enclosed update to the Dresden Nuclear Power Station Unit 1 Decommissioning Program Plan. The Decommissioning Program Plan is being reformatted and revised into a Defueled Safety Analysis Report (DSAR). Together with the PSDAR update submitted in reference 1, these documents replace the Dresden Unit 1 Decommissioning Program Plan (reference 2) in accordance with the existing NRC decommissioning regulations. The DSAR contains relevant information transferred from the Decommissioning Program Plan, as well as information reflecting changes made to the facility under 10 CFR 50.59 from the date of reference 2 through March 1, 1998. A summary of changes is presented in Attachment 1.

Please direct any questions regarding this matter to Kenneth A. Ainger at (630) 663-5217.

Sincerely,

Richard P. Tuetken
General Manager, Decommissioning
Projects and Services

Enclosure

Attachment

cc: Regional Administrator
NRR Project Manager
Illinois Department of Nuclear Safety

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ATTACHMENT 1

Summary of Changes to the Decommissioning Program Plan

In accordance with 10CFR50.71(e)(4), the 24-month update of the Decommissioning Program Plan is being performed. Additionally, the Decommissioning Program Plan is being reformatted and revised into a Defueled Safety Analysis Report (DSAR). The methodology and changes incorporated under this update are described below.

Changes Made in 1996, 1997 and 1998

The cut off date for changes being incorporated under this update is March 1, 1998. Pending Decommissioning Program Plan changes (from 12/1/96 through 3/1/98) made under the 10 CFR 50.59 and 10 CFR 50.90 processes are being incorporated into this update.

Additional Changes

In addition to the changes described above, substantive changes are being made to the format and content of the Decommissioning Program Plan as a part of this update. These changes are being made under the 10 CFR 50.59 process.

From 1987 through 1992, Dresden Unit 1 submitted a Decommissioning Program Plan for NRC approval. Revision 3 of the Decommissioning Program Plan was approved by the NRC as the safety analysis report (SAR) for Dresden Unit 1 on September 3, 1993. In 1994, the format and content of the document were revised. Major changes included adding sections describing the Fuel Handling and Storage System and Accident Analyses for Unit 1. In June of 1997, the NRC issued draft Regulatory Guide DG-1067, "Decommissioning of Nuclear Power Reactors". Included in the draft Regulatory Guide is guidance on the format and content of SARs for decommissioned plants. Additionally, the SARs for other utilities undergoing decommissioning were reviewed. Based on this review, it was decided to further reformat and improve the technical content of the Decommissioning Program Plan.

Format

The title of the Decommissioning Program Plan is being changed to Defueled Safety Analysis Report (DSAR).

The DSAR is arranged into the following sections:

1. Introduction and Summary
2. Site Characteristics
3. Facility Design
4. Operations
5. Radiation Protection
6. Accident Analyses
7. Conduct of Operations

Content

In addition to format changes, the following types of substantive changes have been made to the content of the DSAR.

1. Relocation of Information
2. Additions
3. Deletions/Revisions

Relocation of Information

In many cases, the information contained in the DSAR is a duplication of existing information contained in the current Decommissioning Program Plan. Information was relocated from the Decommissioning Program Plan to the DSAR to support the format changes described above. During relocation of information, editorial changes were made to the content of the sections to promote readability. The editorial changes do not affect the overall meaning or content of information.

Additions

Additional technical information was added to the DSAR to improve the overall description of Dresden Unit 1. These changes were made to improve the understanding of system designs and administrative controls, and their relationship to safety evaluations. Where the Decommissioning Program Plan did not contain information to support the format changes described above, technical information was added. Technical information was added for Dresden Unit 1 systems, structures and components (SSCs) and administrative controls important to the safe storage and handling of irradiated fuel or important to Dresden Unit 1, 2 or 3 operations. The Decommissioning Program Plan contained a brief description of accident analyses relevant to the safe storage and handling of irradiated fuel. Information was added to define the scope, assumptions and acceptance criteria utilized in the accident analyses.

Revisions/Deletions

Revision 5 of the Decommissioning Program Plan contained extraneous or redundant SSC or administrative control information unrelated to safety

evaluations for Dresden Unit 1. Some of this information was relocated to the Dresden Unit 1 Post-shutdown Decommissioning Activities Report (PSDAR). Some information was revised to clearly identify that the SSC and administrative controls do not impact nuclear safety and are not required to support the safe storage and handling of irradiated fuel. Other information already contained in stand-alone documents (Dresden Units 2/3 UFSAR, QA Manual, etc.) was not included in the DSAR. Other existing information unrelated to nuclear safety or the safe storage and handling of irradiated fuel was not included in the transition to the DSAR format.