



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

March 15, 1993

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Document Control Desk

Subject: Quad Cities Station Units 1 and 2  
Status Update: Safety Related Contact Testing Adequacy Program  
NRC Docket Nos. 50-254 and 50-265

References: (a) H.J. Miller to Cordell Reed letter dated January 24, 1989

(b) H.J. Miller to Cordell Reed letter dated March 8, 1989

(c) T.J. Kovach to A. Bert Davis letter dated April 11, 1989

(d) H.J. Miller to Cordell Reed letter dated October 9, 1992

(e) T.J. Kovach to USNRC letter dated December 24, 1992

(f) Meeting between CEC Co (J. Schrage, et al) and  
NRC Region III (R. Gardner, et al)

(g) Teleconference between CEC Co (J. Schrage) and  
NRC Region III (D. Butler) on March 3, 1993

In References (a) and (b), the NRC forwarded the results of a special safety inspection at Zion Station, and the violations arising from that inspection. The second violation which was documented in Reference (b) discussed the failure to adequately test logic system contacts at Zion Station. In response to this violation (Reference (c)), Commonwealth Edison (CEC Co) described the plans for a programmatic review of Safety Related contact testing at Zion Station. This description included the method for dispositioning contacts which were required to be tested by the Technical Specifications as part of a channel functional logic test. CEC Co has initiated a similar programmatic review at Dresden, Quad Cities and LaSalle Stations. The NRC reviewed the Dresden Station Safety Related Contact Testing Adequacy (SRCTA) program in Reference (d), and CEC Co provided a status update in Reference (e).

The SRCTA program at Quad Cities Station is currently in-progress. CEC Co has discussed the status of the program with the NRC (References (f) and (g)), including the proposed method for dispositioning contacts which are required to be tested as part of a Technical Specification Logic System Functional Test (LSFT). The purpose of this letter is to describe the method for dispositioning LSFT contacts, as discussed in the Reference (g) teleconference.

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The method for dispositioning LSFT contacts will depend upon the current testing methods in relation to one of three different scenarios. These scenarios, including the dispositioning method for each scenario, are described below:

**Scenario 1**     **Current methods of contact testing demonstrate functionality of the circuit, and overlapping tests demonstrate testing of individual contacts.**

CECo will enhance existing procedures, where appropriate, and test contacts at the next scheduled surveillance.

**Scenario 2**     **Current methods of contact testing demonstrate functionality of the circuit; overlapping tests do not exist, or do not demonstrate testing of individual contacts.**

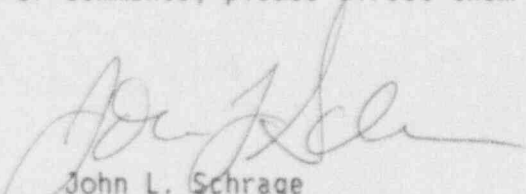
CECo will:

- i. Immediately notify the Resident Inspector Staff; and,
- ii. Test the individual contacts at power; or,
- iii. Provide justification why the contacts cannot be tested at power. This justification can be based upon: any unusual plant configuration necessary to perform testing, personnel safety, and/or increased potential for challenges to safety systems; and,
- iv. Test the individual contacts at the next outage of sufficient duration (ie: add the required tests to the "QCrash" schedule).

**Scenario 3**     **Current methods of contact testing do not demonstrate functionality of the circuit.**

CECo will immediately notify the Resident Inspector Staff; enter the appropriate Technical Specification LCO and test the contacts immediately; or satisfy the LCO Action Statement.

If there are any questions or comments, please direct them to John L. Schrage at 705-663-7283.

  
John L. Schrage  
Nuclear Licensing Administrator

cc: A. Bert Davis, Regional Administrator-RIII  
C. Patel, Project Manager-WRR  
T.E. Taylor, Senior Resident Inspector-Quad Cities  
R. Gardner, Section Chief-RIII - DRS  
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Office of Nuclear Safety-IDNS