

**Commonwealth Edison**

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ESK-95-019

January 20, 1995

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Quad Cities Nuclear Station Unit 2
Partial Implementation of Approved
Amendment to Facility Operating License
DPR-30
Appendix A, Technical Specifications
Snubber Visual Inspection Intervals
NRC Docket No. 50-265

References: (1) C. P. Patel to D. L. F. letter dated July 13, 1994
(2) Teleconference between USNRC (R. Pulsifer) and ComEd (J. Schrage)
on January 19, 1995

In Reference (1), the NRC issued Amendments 144 and 145 to Appendix A (Technical Specifications) of Facility Operating Licenses DPR-29 and DPR-30 (Quad Cities Nuclear Station Unit 1 and Unit 2). The Amendment 145 approval letter for DPR-30 (Quad Cities Station Unit 2), stated that the license amendment was effective on July 13, 1994 and it should be implemented prior to startup from the thirteenth refuel outage (Q2R13).

In the Reference (2) teleconference, Commonwealth Edison (ComEd) described the potential impact of recent outage schedule changes on the completion of snubber visual inspections, as required by the current Technical Specification (TS) requirements (i.e. prior to implementation of Amendment 145). In order to eliminate the potential impact of these schedule changes on snubber visual inspections, ComEd will partially implement Amendment 145 prior to the start of the thirteenth refuel outage, and complete the implementation prior to startup from that outage. This was discussed with the NRC staff during the Reference (2) teleconference.

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January 20, 1995

The thirteenth refuel outage for Unit 2 (Q2R13) was originally scheduled to start in September 1994. In mid-1994, ComEd rescheduled this start date to January 1995, and revised the start date again in late-1994 to March 5, 1995. Based upon this new start date for Q2R13, ComEd has determined that 111 out of 130 Unit 2 safety-related mechanical snubbers will exceed the current Technical Specification (i.e. prior to Amendment 145) visual inspection surveillance interval between the dates of January 22, 1995 and March 5, 1995 (the start date for Q2R13). ComEd has also determined that 79 out of the 111 snubbers are inaccessible during normal plant operation.

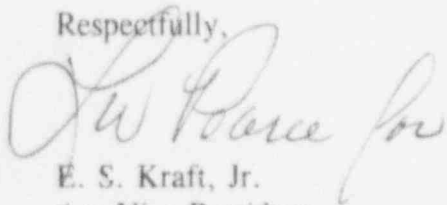
In order to avoid an unnecessary shutdown of Unit 2 (including the associated thermal cycling and safety system challenges) which would be required to perform visual inspections of the 79 inaccessible safety-related snubbers, ComEd will immediately implement TS 4.6.I.2 (including Table 4.6-3) and the first paragraph of TS 4.6.I.3 of Amendment 145. The attachment to this letter provides the revised TS pages. This partial implementation of an approved license amendment is intended to be a one time action by ComEd. ComEd will implement the remainder of Amendment 145 prior to startup following Q2R13.

Once implemented, these new TS sections (and associated table) will define the visual inspection requirements and visual inspection acceptance criteria for safety-related snubbers. As such, the new TS sections will replace current TS sections 4.6.I.1 and 4.6.I.2. Based upon the visual inspection results during Q2R12 (zero failures), the new TS sections will allow ComEd to extend the visual inspection interval for the safety-related snubbers from 18 months ($\pm 25\%$) to 36 months (with an explicit statement that the provisions of TS 1.0.DD apply to surveillance intervals up to and including 48 months), thus eliminating the requirement to perform snubber visual inspections between January 22, 1995 and March 5, 1995.

As a good faith effort to expedite the snubber visual inspections, ComEd will conduct visual inspections on all accessible safety-related snubbers by January 22, 1995, and will complete visual inspections on all inaccessible safety-related snubbers during Q2R13.

Please direct any questions you may have concerning this matter to Nick Chrissotimes at 309-654-2241, extension 3100.

Respectfully,



E. S. Kraft, Jr.
Site Vice President

Attachment

cc: J. Martin, Regional Administrator - RIII
C. Miller, Senior Resident Inspector - Quad Cities
R. Pulsifer, Project Manager - NRR
Office of Nuclear Facility Safety - IDNS