



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

June 19, 1991

Mr. A. Bert Davis
Regional Administration
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Contained in Inspection Report 50-254/89024 and
50-265/89024
NRC Docket No. 50-254 and 50-265

References: (a) T.J. Kovach to A.B. Davis letter dated
August 17, 1990
(b) H.J. Miller to Cordell Reed letter dated
October 25, 1990

Mr. Davis,

In the reference (a) letter, Commonwealth Edison provided a response to a Notice of Violation which cited ineffective corrective actions in response to component failures during the conduct of 10 CFR 50 Appendix J local leak rate testing. In that response, Commonwealth Edison committed to develop a preventative/predictive maintenance program based on the review of the maintenance and test history for all containment components, which maintain containment integrity.

Following the issuance of our response, members of Commonwealth Edison's and NRC's staffs met on September 25, 1990 to discuss our corrective actions. Reference (b) transmitted the summary of the meeting. Based on NRC comments during that meeting, Commonwealth Edison reassessed the methodology for the development of the predictive/preventative maintenance program to identify a more timely, yet effective, method.

The primary objective of the program was to identify and initiate required maintenance actions for components prior to failure. Our initial methodology for the development of the program included a review of all maintenance and test history of each component, which is very resource-intensive. As such, Quad Cities Station personnel developed component "action" leakage limits at which maintenance would be required. The limits were defined based on readily available information and therefore maintenance history research is no longer required.

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The predictive/preventative containment component maintenance program has been developed and consists of the following elements:

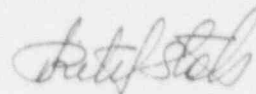
- (a) individual leakage limits, which impose maintenance requirements based on valve size or component type, have been established;
- (b) an administrative as-left maximum pathway leakage limit (75% of the 0.6 La leakage requirement) has been established to create additional margin for the overall containment leakage;
- (c) the use of problem analysis data sheets (PADS), which are a tracking and resolution mechanism for recurring problems, will be required;
- (d) the individual component leakages will be trended on a refueling cycle basis;
- (e) the trends for the individual components leakage rates will be reviewed to assess the performance of each component and to identify and recommend additional corrective actions to be implemented during the next refueling outage.

The above program was developed for use during the November, 1990 Unit 1 Refueling Outage. The implementation of the program was determined to be effective. The as-left maximum pathway leakage of the containment following the implementation of this program was 59% of the 0.6 La leakage limit requirement.

Finally, the post outage review of component performance will be conducted by Corporate and Station test engineers (including at least one test engineer from another CECo facility) and maintenance personnel. The results of the review and the recommendations will be provided to various departments within the CECo organization, including Quality Programs and Assessment.

If there are any questions or comments regarding this topic, please contact R. Stols at (708) 515-7283.

Very Truly Yours,



Rita Stols
Nuclear Licensing Administrative

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