



**Commonwealth Edison**  
One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

December 13, 1983

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Quad Cities Station Unit 1  
Request for Waiver for Containment  
Integrated Leak Rate Test (CILRT)  
NRC Docket No. 50-254

- References (a): March 9, 1983, letter from R. L. Spessard to Cordell Reed transmitting Inspection Report No. 50-254/82-24 and 50-265/82-28.
- (b): April 5, 1983, letter from B. Rybak to J. G. Keppler.
- (c): May 31, 1983, letter from R. L. Spessard to Cordell Reed.
- (d): October 7, 1983, letter from R. L. Spessard to Cordell Reed.

Dear Mr. Denton:

Commonwealth Edison has been notified by Reference (d) that NRR has reviewed Quad Cities Station Unit 1 Type A test reports and Commonwealth Edison's response to Inspection Report Nos. 50-254/82-24 and 50-265/82-28 (Reference (b)) and finds that Quad Cities Unit 1 has failed to meet the Type A test requirement in 10 CFR 50, Appendix J, Section III.A.6.(b) for two consecutive Type A tests.

Commonwealth Edison wishes to request a waiver from the requirement to perform Type A tests during successive refueling outages until two consecutive tests meet the Type A test requirement. Since the deficiency identified in the December, 1982 test was for Type B and C test results and no items of noncompliance were found for the Type A test, Commonwealth Edison proposes as an alternative a corrective action plan to address the specific problem areas. Favorable review and approval of this waiver request would mandate implementation of the corrective action plan in lieu of more frequent Type A tests.

8312200007 831213  
PDR ADOCK 05000254  
P PDR

Ad17  
11

We believe addressing the source of excess leakage to be a more effective remedy than an increased frequency of Type A testing. In our view, the Type A testing serves a different purpose than the Type B and C tests; to provide periodic testing of the passive and structural elements of the containment boundary and to demonstrate the overall adequacy of the Type B and C test program. Although Type A tests can be used to verify a specific Type B or Type C test, it is neither the most appropriate nor most efficient method for that purpose. We believe that the corrective actions planned to address the particular leakage problems at Quad Cities Unit 1, which include more frequent LLRTs of specific components are more effective than the penalty of an increased frequency of Type A testing. Therefore, we request a waiver from the requirement for successive Type A tests for Quad Cities Unit 1.

The corrective action plan includes specific actions to be implemented at the start of the upcoming Unit 1 refueling outage in the Spring of 1984. The corrective action plan addresses each identified problem area on a case-by-case basis and incorporates one or more of the following features:

- 1) Preventative maintenance to reduce the probability of LLRT failures;
- 2) engineering changes to increase valve redundancy to limit potential leakage over a given leakage path;
- 3) improved maintenance procedures to assure proper installation or repairs;
- 4) increased LLRT frequency to provide more frequent monitoring of containment integrity.

In order to assist your evaluation of Commonwealth Edison's waiver request, you will find attached in Appendix A a complete listing of all "as found" Type B and C test results for the last 3 refueling outages. Each LLRT has been analyzed to determine a "worst case" potential leakage from the containment and that value is listed with explanation. In Appendix B, there is a summary of potentially excessive leakage paths and totals for all other Type B and C tests. In Appendix C, there is a copy of Commonwealth Edison's proposed corrective action for Unit 1.

Since the upcoming refueling outage on Unit 1 is scheduled for the Spring of 1984, a prompt review of Commonwealth Edison's waiver request is requested, with a response affirming or denying this request by February 1, 1984.

H. R. Denton

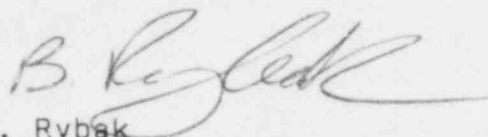
- 3 -

December 13, 1983

If there is anything you need to assist you in your review or if there are changes to the corrective action plan that you wish to suggest, please contact this office.

One signed original and forty (40) copies of this letter with attachment are enclosed.

Very truly yours,



B. Rybak  
Nuclear Licensing Administrator

lm

cc: R. Bevan (NRR)  
Region III Inspector - Quad Cities

Attachments

1. Appendix A - Type B and C LLRT Test Results for Quad Cities Unit 1 During the Last Three Refueling Outages.
2. Appendix B - Summary of LLRT Results including a Listing of Flow Paths With Potential Leakage in Excess of 30SCFH at 48 psig.
3. Appendix C - Corrective Action Plan for Quad Cities Unit 1.

7740N