



Commonwealth Edison

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March 7, 1984

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 that Confirmatory Orders
Related to I.E. Bulletin 80-17
Be Rescinded, and Removal and
Deletion of I.E. Bulletin 80-17
Actions
NRC Docket No. 50-254

- References (a): I.E. Bulletin 80-17 and Supplements
1, 2, 3 and 4. J. G. Keppler letters
to Cordell Reed dated July 3, July 18,
July 22, August 22 and December 19, 1980.
- (b): V. Stello, Jr. letter to Cordell
Reed dated October 2, 1980.
(Confirmatory Orders)
- (c): T. A. Ippolito letter to J. S. Abel
dated January 9, 1981.
- (d): D. G. Eisenhut letter to All BWR
Licensees dated December 9, 1980.
- (e): R. Janecek to letter to J. G. Keppler
dated September 2, 1980.
- (f): D. B. Vassallo letter to D. L. Farrar
dated June 24, 1983.

Dear Mr. Denton:

Reference (f) transmitted Orders requiring installation of the long-term BWR scram discharge modification for each unit at Quad Cities in conformance with the Staff's Generic SER before startup after the first refueling commencing after September 1, 1984. These modifications are being implemented during the current refueling outage at Quad Cities Unit 1.

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Generally, the modifications include two Scram Discharge Instrument Volume (SDIVs), improved communications between the SDV headers and the SDIVs, diverse and redundant scram sensor instrumentation, dedicated and positive vents with two air-operated isolation valves, two air-operated isolation valves on the drain lines, and diverse power supplies for the instrumentation and controls. This installation completely satisfies the requirements of the forementioned NRC Generic SER.

Because the modified Quad Cities Unit 1 scram discharge system satisfies the Long Term Program Criteria of the Generic SER, and because this modified system now reliably provides to the control room operators all information concerning system operation necessary to ensure safe operation of the unit, the following equipment and actions previously required are clearly no longer applicable, and will be removed and/or deleted:

1. The SDV Continuous Monitoring System (CMS) required by I.E. Bulletin 80-17 Supplements 1 thru 4 and the Confirmatory Order, Reference (b), will be removed from Quad Cities Unit 1 and all associated surveillances will be deleted. All operator actions associated with the CMS (i.e. manual scram on SDV hi-hi water level alarm) will no longer be required.
2. The system which initiates control rod insertion on low pressure in the control rod drive control air header. The Order, Reference (c), describes this automatic air header dump system as a short term provision which provides protection against water accumulation in the Scram Discharge Volume (SDV) headers in the event of degraded air conditions in BWR control air supply systems. As acknowledged in the Generic SER, improved hydraulic coupling resulting from permanent modifications such as those to be completed by Quad Cities Unit 1 will obviate the need for an automatic air header dump system. In fact, certain licensees identified in Table 1 of the SER were excluded from the air dump requirements because they already have adequate SDV - instrument volume hydraulic coupling.
3. Testing of the SDIV level switches after each scram event as required by I.E. Bulletin 80-17 Supplement 3 will no longer be performed. Supplement 3 specifically acknowledges that this testing is not required subsequent to the long term modifications.

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4. Purging the SDV vent after each scram event as committed in Reference (e) will no longer be performed.

We believe that I.E. Bulletin 80-17 (including supplements) and the References (b) and (c) Confirmatory Orders are implicitly applicable only until modifications satisfying the Long Term Program Criteria of the Generic SER are implemented. Furthermore, we believe that these modifications at Quad Cities Unit 1 provide equivalent information to the operator, with a greater level of safety and reliability than the Continuous Monitoring System required by the Confirmatory Order dated October 2, 1980 and that these modifications ensure adequate hydraulic coupling to allow removal of the automatic air header dump system. Considering the above, we hereby request that the October 2, 1980 and January 9, 1981 Orders as they pertain to Quad Cities Unit 1 be rescinded.

Please direct any questions you may have concerning this matter to this office.

One signed original and sixty (60) copies of this letter is provided for your use.

Very truly yours,

B. Rybak (for)

B. Rybak
Nuclear Licensing Administrator

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cc: R. Bevan - NRR
NRC Resident Inspector - Quad Cities

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