



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

July 11, 1985

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

Subject: Quad Cities Station Unit 1
Proposed Exigent Technical
Specification Amendment to RHR
Pump Operability Requirements
NRC Docket No. 50-254

Dear Mr. Denton:

Pursuant to 10 CFR 50.9C, Commonwealth Edison (CECo) proposes an exigent amendment to Appendix A, the Technical Specification, for Operating License DPR-29. The proposed change extends the allowed period of operation with an RHR pump out-of-service from 30 to 60 days.

On July 1, 1985, while running the "B" Residual Heat Removal (RHR) Loop in the containment cooling mode, the 1B RHR pump tripped. Preliminary investigation indicated that the upper motor bearing oil seal had failed. In accordance with Technical Specification 4.5.A.4, surveillances to demonstrate the operability of the remaining RHR system components and supporting systems were immediately initiated and successfully completed. Subsequent investigations have determined that the 1B RHR pump motor windings and oil seal have been damaged. At this time, the pump motor has been disassembled and removed and is being prepared for shipment to be repaired. Due to extensive interference with other piping and equipment, this effort alone has consumed 10 days of the allowable 30-day period of inoperability. In addition, our efforts have determined that there are no facilities available to us at this time that can perform safety-related repair work on contaminated components. For these reasons it is our belief that we will be unable to repair and return the pump to service within the allowed 30-day period necessitating an extension to the Technical Specification time limitation to avoid a forced reactor shutdown.

The following efforts are underway to enable us to return the pump to service at the earliest possible date:

- At our request, General Electric Company is contacting all domestic BWRs to locate a spare pump motor. At this time, the only spare located is at Monticello and appears to be incompatible with our pump.
- We are working with the Bingham Pump Manufacturer to design a transition piece to allow use of the Monticello pump.

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- We are investigating our internal ability to fabricate an adapter to allow use of our present transition piece with the Monticello pump.
- In addition to General Electric's efforts, we are contacting other utilities via the PIMs program to locate a spare motor.
- We are working with General Electric to determine the feasibility of decontaminating the motor to the extent necessary to allow unconditional release and shipment to GE's facilities for re-winding.
- Although Babcock and Wilcox (B&W) has indicated they can service contaminated equipment, they are not currently approved by CECo for this type of safety-related work. We are performing an expedited review of their Quality Assurance program.
- We have assigned Quality Control and Quality Assurance personnel to determine if B&W can perform the repair under CECo's Quality Assurance program including observation of the repair by our QA and QC personnel.

We will continue pursuing all available paths to repair the motor or procure a replacement on an emergency basis. In spite of our efforts, it appears unavoidable that the repair and reinstallation of the pump motor will extend beyond the allowed 30-day period. Hence, we find no alternative to requesting this extension promptly to allow your staff the maximum possible review time. Since this event could not have been anticipated and we are actively pursuing all possible options to avoid a reactor shutdown under the current Technical Specification, we request your prompt review and approval of our proposed Technical Specification amendment under the provisions of 10 CFR 50.91.a.6.

The proposed amendment can be found in Attachment 1 and has been both On-Site and Off-Site reviewed. We have reviewed this amendment request and find that no significant hazards consideration exists. Our review is documented in Attachment 2. Commonwealth Edison has notified the State of Illinois of our request for this amendment and our appraisal on the question of no significant hazards by telephone call and transmittal of a copy of this letter and its attachments to the designated State Official.

Finally, CECo believes that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. Given our belief that the amendment involves no significant hazards consideration and has no environmental impact, we believe the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

H. R. Denton

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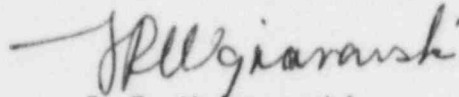
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This approval is required prior to July 31, 1985. In accordance with 10 CFR 170, a fee remittance in the amount of \$150.00 is enclosed.

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

Three (3) signed originals and thirty-seven (37) copies of this transmittal and its attachments are provided for your use.

Very truly yours,



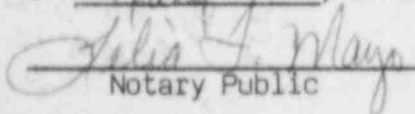
J. R. Wojnarowski
Nuclear Licensing Administrator

lm

Attachments (1): Technical Specification Change to DPR-29
(2): Evaluation of Significant Hazards Consideration

cc: Region III Inspector - QC
R. Bevan - NRR
M. C. Parker - IL

SUBSCRIBED AND SWORN to
before me this 11th day
of July, 1985


Notary Public

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ATTACHMENT 1

PROPOSED AMENDMENT TO DPR-29

TECHNICAL SPECIFICATION

0357K

ATTACHMENT 2

Evaluation of Significant Hazards Consideration

Description of Amendment Request

This amendment would temporarily allow operation of up to 60 days with an inoperable RHR pump provided that during such 60 days the remaining active components of the LPCI mode of the RHR, containment cooling mode of the RHR, all active components of both core spray subsystems, and the diesel generators required for operation are operable.

Basis for Proposed No Significant Hazards Consideration Determination

Commonwealth Edison has evaluated the proposed Technical Specification amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92(c), operation of Quad Cities Unit 1 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because three remaining RHR pumps and the two core spray pumps are available to adequately mitigate all of the FSAR transients.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed technical specification waiver does not allow any new modes of operation beyond that normally performed at operating BWRs.
- 3) Involve any reduction in the margin of safety because all FSAR transients assume one RHR pump to be inoperable.

In consideration of the above, Commonwealth Edison believes that NRC approval of these amendments should not be predicated on satisfactory resolution of public comments or intervention as provided for by 10 CFR 50.91(a)(4). This request is of a type which was specifically cited in the Federal Register (48FR14870) as an example of license amendment not involving significant hazards and therefore not requiring opportunity for prior hearings. That is:

- "(vi) A change which either may result in some increase to the probability or consequences of a previously analysed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan..."