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U.S. Nuclear Regulatory Commission  
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Washington, DC 20555-0001

Quad Cities Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Subject: Quad Cities Nuclear Power Station – Preconditioning of Emergency Diesel Generator Air Start Systems, Fuel Systems, and other Engine and Electrical Components.

Reference: NRC Integrated Inspection Report, “Quad Cities Nuclear Power Station – NRC Integrated Inspection Report 50-254/01-05; 50-265/01-05,” dated April 30, 2001

The purpose of this letter is twofold. First, to inform the NRC that Quad Cities Nuclear Power Station will not dispute the Non-Cited Violation (50-254/01-05-04; 50-265/01-05-04) of 10 CFR 50 Appendix B, Criterion XI, “Test Control,” described in the referenced NRC report. The station similarly concurs that the risk significance was very low (Green). Senior station management and station personnel understand the importance of scheduling and performing Technical Specifications required surveillances such that unacceptable preconditioning does not occur. The instances identified in the referenced NRC report have been entered into the station’s corrective action program and corrective actions have been implemented or are scheduled for implementation.

Second, given the importance of this subject and based upon our review of the NRC integrated inspection report, the station is providing an update on several of the issues discussed in section three, “Units 1 and 2 Emergency Diesel Generator Timed Test Preconditioning Concerns.” This is intended to update the NRC and supplement our shared understanding of the issues. The following specific points are provided:

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- *"The inspectors observed operators looking for acceptable locations to determine jacket water temperature and lube oil temperature to meet the requirements of QCOS 6600-45, 'Unit 2 Diesel Generator Semi-Annual Timed Start Test,' Revision 2."*

Operators were provided direction in their pre-job brief to obtain jacket water and lube oil temperatures to satisfy the requirements of the surveillance procedure and to ensure that standby conditions were met. As part of their briefing they were directed to obtain engine temperatures and report back to the control room. The local operators performed this task as directed by their supervision and as discussed during their pre-job brief. Appropriate and acceptable temperature readings were obtained prior to the performance of the surveillance to correctly determine that the engine was in a standby condition. Therefore, the surveillance prerequisite of verifying the engine in a standby condition was properly satisfied.

- *"The jacket water temperatures recorded were on a run of piping in which there was no forced flow. The oil temperature recorded was on an oil cooler outlet indicator which was not necessarily representative of internal engine temperatures."*

Jacket water and lube oil temperatures were representative of engine temperatures and were taken in locations designated by the manufacturer. By design, there is no forced flow for jacket water in the standby condition. Rather, natural circulation occurs and supports the obtainment of a representative temperature. Lube oil temperature is indicated at the outlet of the oil cooler. This indication is representative of engine lube oil conditions because of the forced lube oil flow through the engine and because there is no forced cooling water flow through the lube oil cooler when the engine is in the standby condition which was the circumstance during the inspector's observations.

- *"The licensee performed the surveillance test and found the start time to be longer than normal because of degraded air start motor performance, but still acceptable."*

The air start motor and associated controls operated as designed. Recently installed design improvements now allow for a "re- crank" of the emergency diesel generator air start motor in the event the bendix does not engage on initial demand. The air start motor performance was not degraded and the emergency diesel generator met its Technical Specifications required start time.

In closing, we would like to reiterate that senior station management and station personnel understand the importance of scheduling and performing Technical Specifications required surveillances such that unacceptable preconditioning does not occur. Should you have any questions concerning this letter, please contact Mr. W. J. Beck at (309) 227-2800.

Respectfully,



Timothy J. Tulon  
Site Vice President  
Quad Cities Nuclear Power Station

cc: Regional Administrator – NRC Region III  
Director - Office of Enforcement  
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station