



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

January 12, 1989

Docket Nos. 50-254 and 50-265

Mr. Henry E. Bliss
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Bliss:

SUBJECT: TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATION
REQUIREMENTS FOR CO₂ FIRE HOSE STATIONS

RE: Quad Cities Nuclear Power Station, Units 1 and 2

By letter dated December 30, 1988, Commonwealth Edison Company (CECo) requested a temporary waiver of compliance from the Technical Specifications (TS) regarding carbon dioxide (CO₂) fire hose stations installed at the Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. TS 3.12.E.1 specifies that all fire hose stations listed in Table 3.12-4 shall be operable. However, this table does not differentiate between CO₂ and water hose stations. TS 4.12.E prescribes the surveillance requirements for all fire hose stations listed in Table 3.12-4. It has been CECo's contention that two of the surveillance requirements (TS 4.12.E.2 & 4) for fire hose stations do not apply for CO₂ hose reels, even though TS make no such distinction. Consequently, these requirements were not covered by existing QCNPS surveillance procedures for CO₂ hose reels. In the aforementioned letter, CECo provided technical justification for not conducting TS 4.12.E.2 & 4 on CO₂ hose reels based upon the National Fire Protection Association (NFPA) Code 12 maintenance requirements in effect when the reels were originally installed. The December 30, 1988 letter, requesting a temporary waiver of compliance, will be promptly followed by an application to amend the TS accordingly.

We have reviewed your request and concur that the surveillance requirements detailed in TS 4.12.E only apply to water hose stations. Although the present surveillance testing of CO₂ hose reels being performed at QCNPS met the original NFPA Code 12 requirements,² they do not appear to meet current NFPA code testing requirements contained in Section 1-11.2.7. However, from discussions held with the QCNPS Nuclear Licensing Administrator on January 3, 1989, it is our understanding that CECo has decided to comply with the intent of Section 1-11.2.7 (i.e. conduct hydrostatic tests or replace as required). On the basis of CECo's technical justification and their decision to comply with applicable NFPA code, the NRC grants CECo approval for a temporary waiver of compliance from TS 4.12.E.2&4 for CO₂ fire stations listed in Table 3.12-4. This waiver is valid for no more than ninety days.

8901200111 890112
PDR ADDCK 05000254
F PNU

DF01
1/10
c/p-3
cek

January 12, 1989

Mr. Henry E. Bliss

- 2 -

By the end of ninety days, the staff expects to issue an amendment to the Quad Cities Technical Specifications. Your letter containing the proposed amendment should also include a discussion on meeting the requirements of Section 1-11.2.7 of NPFA Code 12 currently in effect for the CO₂ fire hose stations.

Sincerely,



Martin J. Virgilio
Acting Assistant Director
for Region III and V
Division of Reactor Projects III,
IV, V and Special Projects

cc: See next page

Mr. Henry E. Bliss
Commonwealth Edison Company

Quad Cities Nuclear Power Station
Units 1 and 2

cc:

Mr. Stephen E. Shelton
Vice President
Iowa-Illinois Gas and
Electric Company
P. O. Box 4350
Davenport, Iowa 52808

Michael I. Miller, Esq.
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Mr. Richard Bax
Station Manager
Quad Cities Nuclear Power Station
22710 206th Avenue North
Cordova, Illinois 61242

Resident Inspector
U. S. Nuclear Regulatory Commission
22712 206th Avenue North
Cordova, Illinois 61242

Chairman
Rock Island County Board
of Supervisors
1504 3rd Avenue
Rock Island County Office Bldg.
Rock Island, Illinois 61201

Mr. Michael E. Parker, Chief
Division of Engineering
Illinois Department of Nuclear Safety
1035 Outer Park Drive,
Springfield, Illinois 62704

Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

January 12, 1989

Mr. Henry E. Bliss

- 2 -

By the end of ninety days, the staff expects to issue an amendment to the Quad Cities Technical Specifications. Your letter containing the proposed amendment should also include a discussion on meeting the requirements of Section 1-11.2.7 of NPFA Code 12 currently in effect for the CO₂ fire hose stations.

Sincerely,

Martin J. Virgilio
Acting Assistant Director
for Region III and V
Division of Reactor Projects III,
IV, V and Special Projects

cc: See next page

DISTRIBUTION:

Docket file
NRC & Local PDRs
GHolahan
MVirgilio
DMuller
LLuther
BSiegel
OGC
EJordan
BGrimes
ACRS (10)
PDIII-2 r/f

*See previous concurrence

PDIII-2
*BSiegel:km
1/4/89

PDIII-2
*LLuther
1/4/89

PDIII-2
*DMuller
1/4/89

ECEB
*DKubicki
1/4/89

REGIONIII
*EGreenman
1/4/89

(A)AD:DRSP35
MVirgilio
1/12/89

Mr. Henry E. Bliss

By that time the staff expects to issue an amendment to the Quad Cities Technical Specifications. Your letter containing the proposed amendment should also include your commitment to meet the requirements of Section 1-11.2.7 of NPFA Code 12 currently in effect for the CO₂ fire hose stations.

Sincerely,

Martin J. Virgilio
Acting Assistant Director
for Region III and V
Division of Reactor Projects III,
IV, V and Special Projects

DISTRIBUTION:

- Docket file
- NRC & Local PDRs
- GHolahan
- MVirgilio
- DMuller
- LLuther
- BSiegel
- OGC
- EJordan
- BGrimes
- ACRS (10)
- PDIII-2 r/f

*Verbally
Concurred*

PDIII-2
BSiegel:km
01/04/89

PDIII-2
LLuther
01/04/89

P.S. FOR
PDIII-2
DMuller
1/4/89

ECEB
DKubicki
1/4/89

REGION III
EGreenman
1/4/89

(A)AD:DRSP35
MVirgilio
1/89

January 12, 1989

Mr. Henry E. Bliss

- 2 -

By the end of ninety days, the staff expects to issue an amendment to the Quad Cities Technical Specifications. Your letter containing the proposed amendment should also include a discussion on meeting the requirements of Section 1-11.2.7 of NPFA Code 12 currently in effect for the CO₂ fire hose stations.

Sincerely,

Martin J. Virgilio
Acting Assistant Director
for Region III and V
Division of Reactor Projects III,
IV, V and Special Projects

cc: See next page

DISTRIBUTION:

Docket file
NRC & Local PDRs
GHolahan
MVirgilio
DMuller
LLuther
BSiegel
OGC
EJordan
BGrimes
ACRS (10)
PDIII-2 r/f

*See previous concurrence

PDIII-2
*BSiegel:km
1/4/89

PDIII-2
*LLuther
1/4/89

PDIII-2
*DMuller
1/4/89

ECEB
*DKubicki
1/4/89

REGIONIII
*EGreenman
1/4/89

(A)AD:DRSP35
MVirgilio
1/12/89