

#14 8/19



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 15, 1991

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

**Subject: Quad Cities Nuclear Power Station Units 1 and 2
Dresden Nuclear Power Station Units 2 and 3
Implementation of Alternate Rod Insertion (ARI)
System Diversity Requirements in 10 CFR 50.62
NRC Docket Nos. 50-254/265 and 50-237/249**

- Reference:**
- (a) Letter from J.M. Taylor, Executive Director of Operations to G.J. Beck, Chairman BWR Owners Group dated September 20, 1990
 - (b) Letter from R.J. Barrett to T.J. Kovach dated January 11, 1991
 - (c) Letter from D.L. Taylor to Office of Nuclear Reactor Regulations dated March 15, 1991

Dear Dr. Murley:

Reference (a) indicated that the NRC staff's position on the ARI trip unit diversity was the proper implementation of the ATWS Rule. Specifically, the staff's position required trip units in the ARI system to be diverse from the trip units in the reactor trip system. Accordingly, reference (b) requested Commonwealth Edison (CECo) to confirm if LaSalle, Dresden and Quad Cities Station conform to the staff's position on diversity of trip units between the ARI system and the reactor trip system.

9108260121 910815
PDR ADOCK 05000237
PDR

ADD 1

August 15, 1991

Reference (c) provided the response to the NRC's request. During our review for compliance with the staff's position, CECo identified that all three stations utilize Rosemount master trip units to monitor reactor water level in both the ARI and reactor trip systems. In addition, CECo identified that, at Dresden and Quad Cities, Agastat model EGP relays are used in the reactor water level instrumentation for both systems.

CECo is currently preparing the appropriate design changes to replace the Rosemount master trip units which are used to monitor reactor water level at each of our stations; however, CECo requests that the NRC grant an exemption from the staff's position requiring the replacement of Agastat relays. The primary basis for the exemption request is that the existing relays by design to actuate in opposite energization states meets the underlying purpose of the ATWS Rule and replacement of the relays is, therefore, not necessary. In addition, the cost of the significant design change needed to replace the relays is not justified based upon the low probability of an ATWS event compounded by the extremely low probability of an unknown common mode relay failure. A complete discussion of the basis for the exemption request is provided in the attachment.

In accordance with 10 CFR 50.12(a) (2) (ii) and (iii), CECo respectfully requests that a specific exemption from the staff's stated position requiring the replacement of the Agastat relays be granted. If there are any questions or comments, please contact the Quad Cities Licensing Administrator at (708) 515-7283.

Very truly yours,



Rita Stols
Nuclear Licensing Administrator

Attachment

cc: A. Bert Davis, Regional Administrator-RIII
L.N. Olshan, Project Manager-NRR
B.L. Siegel, Project Manager-NRR
T.E. Taylor, Resident Inspector-Quad Cities
W.G. Rogers, Resident Inspector-Dresden