



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 30, 1994

Mr. William T. Russell, Director
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Commonwealth Edison (ComEd) Response to NRC Request for
Additional Information (RAI) to Generic Letter (GL) 89-19,
"Request for Action Related to Resolution of Unresolved Safety
Issue A-47 'Safety Implication of Control Systems in LWR
Nuclear Power Plants' Pursuant to 10 CFR 50.54(f)," dated
April 2, 1990
NRC Docket Nos. 50-237/249 and 50-254/265

References: (a) A Gody, Jr. letter to D. Farrar, dated July 25, 1994.
(b) M. H. Richter letter to U. S. NRC, dated March 23, 1990.

Mr. Russell:

This memorandum transmits ComEd's response (attached) to the Reference (a) Request for Additional Information (RAI) for Generic Letter 89-19. Generic Letter 89-19 addressed reactor vessel overfill protection requirements for BWRs and steam generator overfill protection requirements for PWRs. The NRC RAI requests confirmation that the actions committed to in the Reference (b) letter were completed for Dresden and Quad Cities Stations, and further requests an explanation of how the daily instrument check takes the place of a monthly functional test.

The actions committed to by Dresden and Quad Cities in the Reference (b) letter have been completed. The daily instrument check at Dresden and Quad Cities Stations is not equivalent to a monthly functional test. Dresden does not perform monthly functional testing because, with the current logic scheme for the main turbine trip circuitry (1-out-of-2 once), testing of the high level contacts for the feedwater pumps (2-out-of-2) would result in a turbine trip and subsequent reactor scram.

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The logic for this system at Quad Cities is two-out-of-two for the feedwater pump high level and main turbine trip circuitry. If the trip system is functionally tested during power operation, this logic results in an increased risk of a turbine trip and subsequent reactor scram.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other ComEd employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

If there are any questions concerning this matter, please contact this office.

Sincerely,

A handwritten signature in dark ink, appearing to read "Peter L. Piet", is written over a circular stamp or seal.

Peter L. Piet
Nuclear Licensing Administrator

Attachment

cc: J. B. Martin, Regional Administrator - RIII
J. F. Stang, Project Manager - NRR
R. M. Pulsipher, Project Manager - NRR
M. N. Leach, Senior Resident Inspector - Dresden
C. G. Miller, Senior Resident Inspector - Quad Cities
Office of Nuclear Facility Safety - IDNS

ATTACHMENT

Response to RAI Item #1

Dresden: Dresden Operating Abnormal (DOA) Procedure 0600-01, Transient Level Control, was revised on December 5, 1990 (Revision 7) to require tripping of all condensate pumps and closure of feedwater regulating isolation valves 3206A and 3206B in the event that reactor water level exceeds +48 inches and continues to rise uncontrollably.

DOA 0600-01 was included in a special required reading package sent out to all active licensed personnel on December 21, 1990.

Quad Cities: Not applicable to Quad Cities.

Response to RAI Item #2

Dresden: A daily instrument check was added to Operator Appendices F and G for the 263-59A and 263-59B Yarway level indicators on September 10, 1990. The daily check cannot take the place of a monthly functional test. Dresden does not perform monthly functional testing because, with the current logic scheme for the main turbine trip circuitry (1-out-of-2 once), testing of the high level contacts for the feedwater pumps (2-out-of-2) would result in a turbine trip and subsequent reactor scram.

Quad Cities: A daily instrument check was added to QOS 005-1, S1, S13, S14, and S19 (Operations Department Weekly Summary of Daily Surveillances) on October 28, 1990, for the 263-59A and 263-59B Yarway level indicators. ComEd implemented a once-per-refuel high-level functional test for the 263-59A and 263-59B Yarway level indicators at Quad Cities Station on April 25, 1990 (QIP 5610-26-6, Reactor High Water Level Turbine/Reactor Feed Pump Trip Functional Test).

The daily instrument check at Quad Cities Station is not equivalent to a monthly functional test. ComEd does not perform a monthly functional test of this trip system at Quad Cities Station. The logic for this trip system at Quad Cities Station is two-out-of-two for the Feedwater pump high level and Main Turbine trip circuitry. If the trip system is functionally tested during power operation, this logic results in an increased risk of a turbine trip and subsequent reactor scram.

Response to RAI Item #3

Dresden/Quad Cities:

ComEd submitted proposed Limiting Conditions for Operation (LCOs) and Surveillance Requirements (SRs) for instrumentation that provides a trip of the Reactor Feedwater Pumps on high reactor water level in a J.L. Schrage (ComEd) to W.T Russell (NRC) letter dated August 30, 1994. This submittal was part of the Technical Specification Upgrade Program (TSUP Section 3/4.2.J, Feedwater Trip System Actuation).