Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

March 25, 1996

ComEd

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: SCRAM Solenoid Pilot Valves (SSPVs)
Slow SCRAM Insertion Times
Dresden Nuclear Power Station Units 2 and 3
LaSalle County Station Nuclear Power Station Units 1 and 2
Quad Cities Nuclear Power Station Units 1 and 2
NRC Docket Nos. 50-237/249, 50-373/374, 50-254/265

References: (1) BWR Owners' Group letter, BWROG-96012-30, R. A. Pinelli to BWR Owners' Group Executives, "Interim Recommendations of BWR Owners' Group Regulatory Response Group Regarding Viton CRD SSPV Response Time Delay," dated February 16, 1996.

(2) BWR Owners" Group letter, BWROG-96008-30, R. A. Pinelli to Document Control Desk, "BWR Owners' Group Transmittal of Regulatory Response Group Interim Safety Assessment and Interim Action Plan Schedules," dated February 2, 1996.

ComEd has been working aggressively with the BWR Owners' Group (BWROG) Regulatory Response Group to develop interim actions which address the Control Rod Drive Scram Solenoid Pilot Valve (SSPV) Response Time Delay problem. The BWROG issued recommendations for interim actions in the Reference 1 letter. These actions were discussed with the NRC on February 21, 1996. The recommendations provide guidance related to testing of the dual type ASCO SSPVs with Viton internals and testing of the Alternate Rod Insertion (ARI) system.

ComEd will implement the BWROG guidance related to the testing of both the SSPVs and ARI. Specifically, we will assure that the 120 day test described in the Reference 1 letter includes a "representative sample" of Viton SSPV control rods and Buna-N SSPV control rods. The "reference sample" described in the Reference 1 letter will consist of Viton SSPV control rods (consisting of 5% but not less than 5 of the Viton SSPV control rods) and will be tested on an approximate 60 day surveillance cycle. These interim actions will be implemented at the frequencies described in the Reference 1 letter for Dresden Unit 2, Quad Cities Units 1 and 2, and LaSalle County Station Unit 1. Dresden Unit 3 and LaSalle County Station Unit 2 are currently operating with known fuel failures. In an effort to reduce the amount of load cycling and duty on their leaker fuel assembly, all the scram testing will be performed on an approximate 90 day frequency (i.e., both the 60 day and 120 day testing will be performed together at 90 day intervals). This will enable the scram testing to be scheduled with other 90 day required

A001 1/0

surveillances which require power reductions to perform. ComEd believes that this is consistent with recent industry experience in maintaining leaker fuel integrity. The 90 day interval provides an increased testing frequency that will allow the sites to take actions prior to exceeding the 0.49 second 5% control rod drive insertion criteria discussed in Reference 2. We will be removing the fuel leakers from those units during their next scheduled refuel outages. At that time, those units will perform the 60 and 120 day testing if the requirement is still in place.

All the ComEd BWR units will evaluate the scram time data obtained during each test and utilize the information to confirm Technical Specification compliance at the time of the test as well as to predict potential problems in the future. It is our goal to conservatively trend the data obtained in order to minimize the potential for a forced unit shutdown should the Technical Specification limit be exceeded.

ComEd will also perform ARI system testing to assure that it functions properly. This testing will be done once per cycle as long as BWROG interim actions are in effect.

Our operating units are well within Technical Specification limits, and we will continue to actively work with General Electric and the BWR Owners' Group (BWROG) in the collective effort to resolve this concern.

If you have any questions please contact this office.

Sincerely,

John Hosmer
Vice President - Engineering

cc: H. Miller, Regional Administrator - Region III
J. Stang, Dresden Project Manager - NRR
R. Pulsifer, Quad Cities Project Manager - NRR
D. Skay, LaSalle Project Manager - NRR
C. Vanderniet, Senior Resident Inspector - Dresden
C. Miller, Senior Resident Inspector - Quad Cities
P. Brochman, Senior Resident Inspector - LaSalle
D. Skeen, NRR