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*Central
Files*

August 7, 1980

Mr. James G. Keppler, Director
 Directorate of Inspection and
 Enforcement - Region III
 U.S. Nuclear Regulatory Commission
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
 Quad Cities Station Units 1 and 2
 Response to IE Bulletin 80-17,
 Supplement 1
 NRC Docket Nos. 50-237/249
 and 50-254/265

Reference (a): J. G. Keppler letter to C. Reed dated
 July 18, 1980

Dear Mr. Keppler:

This letter provides the response for Dresden Units 2/3 and
 Quad Cities Units 1/2 to Supplement 1 to IE Bulletin 80-17,
 transmitted by Reference (a).

The response to items A.1 through A.5 are contained in the
 enclosure to this letter. Please note that the drawings provided in
 response to item A.1 are not complete at this time. The drawings
 contain a small number of discrepancies consisting of missing or
 incorrect dimensions and deviations from actual routings. Corrected
 drawings will be provided as soon as they become available.

Response to Items B.1 and B.2 will be provided within the
 time frame specified. Please address any questions concerning this
 matter to this office.

Very truly yours,

D. L. Peoples

D. L. Peoples
 Director of
 Nuclear Licensing

SUBSCRIBED and SWORN to
 before me this 7TH, day
 of August, 1980

[Signature]
 Notary Public

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Enclosure
Response to IE Bulletin 80-17, Supplement 1
Dresden Units 2 and 3
Quad Cities Units 1 and 2

Item A.1

In reviewing the Dresden and Quad Cities Plants Commonwealth Edison has confirmed that all Scram Discharge Volume Piping, Scram Instrument Volume Piping and drain piping meet the design requirement of having a downward pitch to facilitate draining and level indication. The vent piping meets the design criteria of a pitched line. However, potential water traps were identified at Dresden which might deter air flow during draining. To insure this does not occur, anytime water is detected in the scram discharge volume or after a scram the vent lines are blown out with service air to ensure no water is present in the vent line prior to draining. In addition, as indicated in our response to Supplement 2 of the Bulletin, positive venting has been insured at Dresden by cutting the vent lines prior to tying into the vent header and at Quad Cities by drilling a 1" hole in the vent header cap to assure a direct path to the atmosphere. Further modification to the vent system will be addressed under the long term fixes.

Item A.2 - Dresden

Procedure DOP 1100-2 has been revised to include SBLC initiation without prior supervisory approval. The procedure states:

"The NSO will start Standby Liquid Control without supervisor permission:

If either two (2) or more adjacent rods are not inserted past the O6 position or thirty (30) or more rods are not inserted past the O6 position and if reactor water level cannot be maintained or suppression pool water temperature cannot be maintained below 110°F."

Quad Cities

Procedure QOP 1100-2, Manual initiation of SBLC, states those conditions which necessitate SBLC initiation. To make the procedure more comprehensive and concise, it has been revised to clarify those conditions. Per the revised procedure, the need for SBLC initiation is based on:

- a. The reactor cannot be shutdown or cannot be maintained in a shutdown condition.
- b. The Shift Engineer or other senior licensed management personnel have determined need for injection.

or

Injection is required due to an ATWS situation,

or

If the control rod system is unable to maintain the reactor in a subcritical condition, and either reactor water level cannot be maintained or the suppression pool temperature cannot be maintained below 110 °F. SBLC need not be initiated upon determination by the unit nuclear engineer that criticality would not be achieved during cooldown.

Item A.3 - Dresden

Operating Order #25-80 has been written specifying remedial action to be taken if water is found in the scram discharge volume (SDV). The following actions are specified:

1. Check open the air operated SDV vent and drain valves.
2. Check open the manual SDV vent valves [2(3)-0399-529, 530, 533 and 534] located near the LPCI 1501-21 motor operators.
3. Listen and/or feel for air flow into the SDV while manually operating the vent line vacuum breaker.
4. If any of the above valves were found closed or air flow into the SDV was indicated, wait approximately 5 minutes and perform a second UT on the SDV.
5. If water is still present in the SDV and remaining constant, contact the Tech Staff to perform a dynamic air test on the system.
6. Perform another UT on the SDV approximately 5 minutes after step 5 above is complete.
7. If water is found in step 6 above and remaining constant, open the scram instrument volume (SIV) float level switch vents and monitor the flow. Close the SIV float level switch vents when flow has stopped and perform another UT on the SDV.
8. If water is still detected in step 7 or the 4" header is 45% full, immediately commence an orderly reactor shutdown.

Quad Cities

Procedure QOA 300-12 has been written to specify those remedial steps to be taken if water is found in the SDV when it should be free of water. Remedial actions to be included are to:

- a. Open the SDV vent and/or drain valves if closed, and correct cause of closure. If sufficient water is in the SDV, and a draining and/or venting problem is corrected, the water would likely then flow to the instrument volume causing possible alarm, rod block, reactor scram.
- b. Examine vent holes in vent header for blockage and clear them if necessary.
- c. Check RBEDT level, and pump down if deemed necessary.
- d. Monitor Control Room annunciator indication relating to SDV level, and refer to associated annunciator procedures.

Item A.4 - Dresden

No new procedural requirements have been deemed necessary to implement this item. The key has simply been moved from the Shift Engineer's key locker to a location adjacent to the SBLC keylock switch on the Reactor Control Panel.

Quad Cities

The SBLC key is readily available in the Shift Engineer's Office for use by the Control Room operator. Procedure QAP 300-14 governs the control of this key. No changes to administrative procedures are deemed necessary. However, QOP 1100-1 (Standby Operation of SBLC) and QOP 1100-2 (Initiation of SBLC) have been revised to clarify key location and use.

Item A.5

Daily monitoring for water accumulation in the scram discharge volumes is continuing and will continue until the continuous monitoring systems are installed and operational.