

Commonweal Edison One First National Plaza, Chicago, Illinois Address Reply to: Post Office Box 767 Chicago, Illinois 60690

Mr. Darrell G. Eisenhut, Director Division of Licensing U.S. Nuclear Regulatory Commission Washington, DC 20555

> Subject: Dresden Station Units 2 and 3 Quad Cities Station Units 1 and 2 Supplemental Response to NUREG 0737 Item II.K.3.16 concerning Reductions of Challenges and Failures of Relief Valves NRC Docket Nos. 50-237/249 and 50-254/265

May 1, 1981

References (a):

- D. B. Waters to D. G. Eisenhut dated March 31, 1981 (BWR Owners' Group letters) #8134)
- (b): J. S. Abel letter to D. G. Eisenhut dated April
 1, 1981

Dear Mr. Eisenhut:

Commonwealth Edison Company has reviewed the requirements of NUREG 0737 Item II.K.3.16 in conjunction with the BWR Owners' Group report on this subject submitted by Reference (a). The purpose of this review was to assess the need for and proposed schedule of modifications required to reduce the likelihood of stuck open relief valve (SORV) events. Dresden and Quad Cities were reviewed separately due to significant equipment differences between the two stations.

Dresden Units 2 & 3, due to isolation condensers, meet the acceptance critieria provided in the owner's group response. The low event probability predicted (8) is less than the 10% of the reference plant event probability (100 normalized). Therefore no modifications are planned for Dresden Units 2 and 3 (as concluded previously in Reference (b)).

Quad Cities Units 1 & 2, with RCIC installed in lieu of the isolation condenser, require evaluation further to demonstrate that the event probability meets the Owners' Group criteria (starting with an SORV Event Probability Index of 78).

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- The current relief valve setpoints are based on plant transient analyses performed to preclude second actuation of all but one relief valve; this has an event probability reduction equivalent to the effect of the proposed relief valve low-low set modification. (Cumulative SORV Event Probability 29).
- 2. The relief valve types employed (one 3 stage Target Rock, four Dresser Electromatic valves per unit) indicate a further reduction in event probability, due to the relative performance factors assigned in the owner's group response.(Cumulative SORV Event Probability 12)
- 3. In addition, the Target Rock pneumatic supply was recently evaluated per IE Bulletin 80-25 and is in conformance with the proposed owners group modification goals. (Cumulative SORV Event Probability 9)

In conclusion of the above, Commonwealth Edison believes that the SORV event probability for Quad Cities Units 1 & 2 is below 10% of the reference plant event probability and is compliant with the acceptance criteria provided in the Owners' Group response. Therefore no modifications are indicated or planned at this time.

If you have any questions concerning this matter, please direct them to this office.

One (1) signed original and fifty-nine (59) copies of this transmittal are provided for your use.

Very truly yours,

S. Abel

J. S. ADEI Director of Nuclear Licensing

cc: RIII Inspector - Dresden RIII Inspector - Quad Cities

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