Commonwealth Edison
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August 15, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 3
Quad Cities Station Unit 2
Inspection of BWR Stainless
Steel Piping
NRC Docket Nos. 50-249 and 50-265

References (a): Cordell Reed letter to the Secretary of the NRC dated July 21, 1983.

(b): L. O. DelGeorge letter to H. R. Denton dated August 1, 1983.

(c): D. G. Eisenhut letter to D. L. Farrar dated July 21, 1983.

Dear Mr. Denton:

In our August 9, 1983 meeting with you and your staff concerning inspections of the stainless steel piping for both Dresden Unit 3 and Quad Cities Unit 2; we were requested to provide additional information and to consider certain interim measures until our scheduled refuel outages of September 30, 1983 and September 4, 1983. Enclosed is our response to this request.

If you have any questions on this matter, please contact this office.

Very truly yours,

Cordell Reed

Cordell Reed
Vice-President

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Attachments

cc: J. G. Keppler - Region III
R. Gilbert - NRR
R. Bevan - NRR
NRC Resident Inspector - Dresden
NRC Resident Inspector - Quad Cities

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ATTACHMENT A

Dresden Unit 3 and Quad Cities Unit 2

Additional Information and Interim

Commitments Regarding IGSCC

During a meeting with the NRC, Commonwealth Edison was requested to provide additional information and to consider additional measures as outlined below. Items 1 through 4 will be made effective by August 22, 1983 and the program for operator awareness be completed by August 22, 1983. These commitments will be effective until the scheduled refuel outages for both units.

1. As contained in Reference (a) of this letter, we have committed to lower unidentified leakage limits which will be reported to the General Office on a daily basis.

2. In the event of an unplanned outage where the unit is expected to be in Cold Shutdown greater than 72 hours, CECo will perform a visual inspection of the recirculation system without insulation being removed.

3. We will administratively reduce to three days the unidentified sump monitoring system outage time from the existing limit of seven days.

4. We will defer all planned maintenance outages on the ECCS systems which would made the equipment inoperable. With both units in coastdown and operating at 71 and 55 percent of rated power at Dresden Unit 3 and Quad Cities Unit 2 respectively, and since the time until our scheduled refueling outages are so short we feel any reduction in the allowable outage times for the ECCS systems is unwarranted.

5. To improve operator awareness to both the NRC's and our concerns in this are we are implementing some refresher training to all licensed personnel who would be expected to manipulate reactor controls or supervise control room activities.

6. Enclosed in the form of Attachment B is our corporate IGSCC plan. This plan is still under evaluation and final results are not expected for several weeks.

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ATTACHMENT B

CECo IGSCC Corporate Plan

A Commonwealth Edison task force has been evaluating IGSCC contingency plans issues for many months. The activities of this task force have resulted in the implementation of IHSI on LaSalle 2 and Dresden 3 and Hydrogen Water Chemistry and Weld Overlays on Dresden Unit 2. Recently this contingency planning effort has been focused on developing a long range, integrated plan for correcting IGSCC in BWR Recirculation System Piping. This effort has been continuously updated with the latest industry crack findings and is now undergoing final sensitivity evaluations. Verified results are not expected for several weeks.

The alternatives being evaluated are:

1) Replace all Recirculation System pipes
2) Replace Recirculation System pipe as needed
3) Induction Heating Stress Improvement
4) Hydrogen Water Chemistry
5) Last Pass Heat Sink Welding
6) Weld Overlay
7) Various combinations of the above

Early results also indicate that IHSI applied early can prevent IGSCC. Both of these results were fully expected, however the combinations of alternatives are still being evaluated to identify the optimum plan for safety and minimum resource expenditure.

The final unit by unit, outage by outage, plan will provide a comprehensive optimum long term plan that will maintain the margin of safety through full plant life. It is anticipated this plan will include some combination of weld overlay, IHSI, and partial or full replacement. Hydrogen Water Chemistry would also be considered after fuel effects are evaluated in 1984.

It should be noted that the lack of a long term plan at this time is not the result of lack of interest. The CECo IGSCC Plan will effect six BWRs and result in a massive corporate commitment. It is therefore expected to take more time to develop, in comparison to smaller utility programs. The final plan should be completed in late September.

This long term plan has taken considerable time to develop; because the development process was complex. These complexities included not only a changing data base of cracking, but also rapidly developing alternative corrective measures. These complexities coupled with consideration of multiple reactors requires a thorough decision analysis to develop the optimum plan. As described in the preceding paragraph the decision analysis is in final review. In our judgement this planning is timely and will provide result in an optimum long term plan.

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