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October 23, 1987

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Program Description and Status Report
Piping Configuration Verification Program
NRC Docket Nos. 50-237/249 and 50-254/265

Reference: Letter from I.M. Johnson to A.B. Davis
dated June 22, 1987.

Dear Mr. Davis:

In the above referenced letter, Commonwealth Edison committed to have a description and status report of the Dresden and Quad Cities Station Piping Configuration Verification Program transmitted to Region III on a bi-weekly basis. The last such report was issued to you on October 9, 1987.

Since that time, Commonwealth Edison has evaluated the results of the program and based on the excellent results to date (no discrepancies affecting operability of a given system) has decided to modify the format of the report. Results will be condensed and given in letter form. Additionally, as the project is proceeding smoothly through the FSAR compliance evaluation phase and no signfiicant new issues are anticipated, we propose to submit monthly rather than bi-weekly reports.

This letter reports the status of the program to resolve apparent discrepancies found between the as-built and the as-analyzed condition of certain Mark I torus attached piping at Dresden Units 2 and 3 and Quad Cities Units 1 and 2. A previous report, "Program Description and Status Report," NUTECH Document CEC-99-024, dated June 22, 1987, describes the background and the details of the program for resolution. The purpose of the project is to demonstrate that the affected piping systems meet FSAR criteria, and if necessary, perform corrective work to return the piping to a state of FSAR compliance.

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Screening and Operability Compliance

A process of screening all 364 apparent discrepancies was completed July 10, 1987. This screening process included acceptance criteria designed to identify the discrepancies with the highest potential for adversely affecting piping system operability.

The five piping subsystems thus identified (three at Dresden and two at Quad Cities) were then rigorously analyzed to demonstrate compliance with operability criteria. The analyses which demonstrate operability compliance for these five piping subsystems were completed in September, 1987. Since these five piping systems were identified as having the highest potential for not meeting operability critieria, and since they have now been shown to meet operability critieria, operability has been demonstrated for all the affected piping subsystems.

FSAR Compliance

The current focus of the project is to demonstrate FSAR compliance for the apparent discrepancies on all the piping subsystems or analytical piping models. This effort was begun in August, 1987. As of October 21, 1987, FSAR compliance has been demonstrated for 34, or 52%, of the 65 piping models involved. To date, FSAR compliance has been demonstrated by using manual calculations, except for the five models reanalyzed for operability. Assuming that all the remaining models can also be evaluated with manual calculations, FSAR resolution is scheduled for completion by March 15, 1988. If five models are conservatively assumed to require reanalysis, the completion date for all FSAR resolutions is scheduled for April 15, 1988.

Conclusions to Date

As indicated in the last status report, the following conclusions are becoming evident:

1. Operability for the piping systems within this program has been demonstrated, therefore no immediate safety concerns exist.

2. Of the four categories of discrepancies considered in this program (undemolished pipe supports, mislocated pipe supports, branch connections, and pipe sizes/schedules), the branch connections appear to have the most impact on FSAR criteria compliance, based on evaluations to date. Fortunately, branch connection discrepancies are relatively easy to analyze, and if field corrective work is required, branch connection reinforcements are relatively simple to install. Again, as noted in Item 1 above, operability has been demonstrated for all branch connection discrepancies.

3. All other categories of discrepancies (other than branch connections), have not, in general, impacted FSAR compliance, based on results to date. This trend is encouraging, because mislocated pipe supports and incorrect pipe sizes/schedules can be the most difficult to analyze, and the most difficult to correct in the field.

Please direct any questions you may have regarding this matter to this office.

Very truly yours,

I. M. Johnson
Nuclear Licensing Administrator

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Attachment

cc: M. Grotenhuis - NRR
T. Ross - NRR
M. Ring - Region III

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