



Commonwealth Edison
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Downers Grove, Illinois 60515

December 12, 1990

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Units 1 and 2
LaSalle County Station Units 1 and 2
Response to Generic Letter 89-10 Supplement 3
NRC Docket Nos. 50-237/249,
50-254/265 and 50-373/374

- References:
- (a) NRC Generic Letter 89-10, Safety-Related Motor Operated Valve Testing and Surveillance, dated June 28, 1989.
 - (b) NRC Generic Letter 89-10 Supplement 3, Consideration of the Results of NRC Sponsored Tests of Motor Operated Valves, Dated October 25, 1990, Received November 13, 1990.

Dear Sir:

NRC Generic Letter 89-10 (Generic Letter) extended the recommendations outlined in Bulletin 85-03 and its supplement to all safety-related motor-operated valves (MOV) and position-changeable MOVs in safety-related systems. Generic Letter 89-10 did not, however, recommend that licensees establish any particular priority for MOVs within the generic letter program.

Supplement 3 to the Generic Letter indicated that the information recently obtained from NRC-sponsored MOV tests might affect the priorities being established by licensees for implementing their generic letter programs. From their evaluation of the MOV data provided by the BWR Owners' Group and the results of the NRC-sponsored tests, the NRC staff determined that correction of any deficiencies in the HPCI, RCIC, RWCU and isolation condenser MOVs described in the supplement needed to be given high priority in the implementation of generic letter programs.

The staff determined by means of a safety assessment that such deficiencies might not need to be corrected immediately, however; any MOV deficiencies should be corrected within 18 months or by the end of the first refueling outage, whichever is later, following receipt of the generic letter supplement. The staff's review of a generic safety assessment performed by the BWR Owners' Group confirmed that this time period was acceptable for correcting any deficiencies in the subject MOVs.

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Generic Letter 89-10, Supplement 3 indicated that within 30 days of receipt, BWR licensees should notify the NRC staff that a plant-specific safety assessment report is available on site. Additionally, Supplement 3 indicated that BWR licensees should notify the NRC staff whether licensees believe there are MOVs with deficiencies of greater safety significance than the MOVs used to provide containment isolation in the steam supply lines of the HPCI and RCIC systems, in the supply line of the RWCU system, and in the line to the isolation condenser.

This letter provides the required CECO 30 day response to Generic Letter 89-10 Supplement 3. CECO has prepared and placed on site, plant specific safety assessments addressing the concerns of the Generic Letter supplement. These plant specific safety assessments confirm the NRC safety assessment conclusion that given some of the subject valves may not be capable of closing against the design basis pressure, justification exists for continued plant operation for 18 months or to the end of the next refueling outage whichever is longer.

Additionally, CECO has determined that there are no MOVs with potential deficiencies which have a greater safety significance than the HPCI, RCIC, RWCU and isolation condenser MOVs addressed in the Supplement.

As requested in the supplement, CECO will, within 120 days of the receipt of the GL (March 12, 1991), provide to the NRC staff the following:

- a. Criteria, reflecting operating experience and the latest test data, that were applied in determining whether deficiencies exist in the subject HPCI, RCIC and RWCU MOVs and, in the MOVs in isolation condenser lines;
- b. The identification of any MOVs found to have deficiencies; and
- c. A schedule for any necessary corrective action.

Please direct any questions you have regarding this response to this office.

Respectfully,



D. L. Taylor
Generic Issues Administrator

cc: A.B. Davis, Regional Administrator - Region III
Resident Inspectors - D/QC/LSCS
B. Siegel, Project Manager - NRR
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Signed before me on this 12 day
of December, 1990

Lynn M. Wlodarski
Notary Public

