



Commonwealth Edison
1400 Opus Pl
Downers Grove, Illinois 60515

March 11, 1991

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
120 Day 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.
 - (c) D.L. Taylor letter to US NRC dated December 12, 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.

*Rec'd
4/22/91
F1064
11*

9104240050 910311
PDR ADOCK 05000237
PDR

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.

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.

Reference (c) provided the required CECO 30 day response to Generic Letter 89-10 Supplement 3. The reference indicated that CECO had as requested, prepared and placed on site, plant specific safety assessments addressing the concerns of the Generic Letter supplement. Additionally, Reference (c) indicated that CECO had determined that there were no MOVs with potential deficiencies which have a greater safety significance than the HPCI, RCIC, RWCU and isolation condenser MOVs addressed in the Supplement.

Reference (b) additionally requested that CECO, within 120 days of receipt of the GL, 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.

Additionally, Reference (b) directed CECO to submit plant specific safety assessments and request staff approval if completion of corrective actions was scheduled to occur beyond the 18 month or 1 refueling outage time frame indicated in the Supplement.

~~Accordingly~~ Attachments 1, 2, and 3 to this letter provide the 120 day responses to Generic Letter 89-10 Supplement 3 for Dresden, Quad Cities and LaSalle Stations respectively.

Attachments 4, 5, and 6 provide the plant specific safety assessments addressing those deficient valves for which corrective actions extend beyond the 18 month or 1 refueling outage time frame specified in the supplement.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respect these statements are not based on my personal knowledge, but on information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

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

Respectfully,



D. L. Taylor
Generic Issues Administrator

Attachments

cc: A.B. Davis, Regional Administrator - Region III
Resident Inspectors - D/QC/LSCS
B. Siegel, Project Manager - NRR
L. Olshan, Project Manager - NRR
J. Hickman, Project Manager - NRR

DT/cag
ZNLD806/5-7