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LDC

July 25, 1980

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 1, 2, and 3
Quad Cities Station Units 1 and 2
Response to IE Bulletin 80-14
"Degradation of BWR Scram Discharge Volume Capability"
NRC Docket Nos. 50-10/237/249, and 50-254/265

Reference (a): J. G. Keppler letter to C. Reed dated June 12, 1980

Dear Mr. Keppler:

Reference (a) transmitted IE Bulletin 80-14 requesting a response to concerns identified with BWR Scram Discharge Volume capability.

Commonwealth Edison Company's responses for Dresden Units 2 and 3 and Quad Cities Units 1 and 2 are provided in the Enclosure. In the case of Dresden Unit 1, due to the extended outage associated with that unit, Commonwealth Edison has not performed the reviews requested. The requirements of the subject Bulletin will be met prior to the start-up of the unit.

Per your request in Reference (a), we have estimated the engineering manpower expended in conduct of the review and response to this Bulletin. For Dresden and Quad Cities together, approximately 60 manhours were needed to make the review and prepare reports, and 26 manhours were needed to implement corrective action.

Please address any questions you may have concerning this matter to this office.

Very truly yours,

Robert F. Janecek
for D. L. Peoples
Director of Nuclear
Licensing

Enclosure

cc: NRC Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Washington, DC 20555

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ENCLOSURE

Commonwealth Edison Company

Response to IE Bulletin 80-14

The numbers below correspond to the numbers in the Bulletin.

Dresden Station Units 2 and 3

1.2.4. A complete review of our plant Work Requests, Operator Logs, Deviation Reports, and Equipment History records revealed that none of the following conditions have existed on Dresden Units 2 and 3:

Degradation of SDV level switches due to damaged or bent float assembly.

Degradation of SDV vent and drain valve operability.

Degradation of SDV related piping due to water hammer or water hammer damage.

No documented observed closure times are available, since no tests are performed to monitor the cycling time of these valves, only to ensure that they go shut on a scram.

3. Procedure changes have been initiated to verify that the SDV vent and drain valves are open.

Scram Discharge Volume vent and drain valves are being added to Dresden Operating Surveillance (DOS) 1600-18, as required by the Inservice Inspection (ISI) updated program.

Dresden Operating Order 24-80 requires prompt notification if these valves are found to be inoperable or shut for more than one (1) hour in any twenty-four (24) hour period during operation.

5. A review of administrative procedures and instrument surveillance procedure applicable to the SDV level switches has shown that degradation of any switch due to a damaged float or other cause would be detected, and that inoperability of the rod block and scram switches from any cause would be reported to the NRC.

6. Instrument surveillance DIS 500-5, performed each quarter, ensures operability of each level switch.

Quad Cities Station Units 1 and 2

1. A review of plant records has shown no instances of degradation of any SDV level switch which was or may have been caused by a damaged or bent float assembly.

2. A review of plant records has shown no instances of degradation of SDV vent and drain valve operability. Per the FSAR, Technical Specifications, and system equipment descriptions, there are no required closure times for these valves, and consequently no bases for any closure times exist. No documented observed closure times are available, but an operating history review has shown that these valves typically close on the order of seconds. No events have taken place whereby closures on the order of minutes have been observed.

3. Procedure changes have been initiated to verify that the SDV vent and drain valves are open. The Reactor Scram procedure will be amended to include a step to verify closure of these valves. In both cases, statements are included persuant to the logging and reportability to the NRC concerning inoperable valves or valve closure for more than one hour in any 24 hour period during operation. The proposed periodic test program for the SDV vent and drain valves is as given by the Quad Cities Station Units 1 and 2 Inservice Inspection and Testing Program. This testing will consist of a full stroke exercise and a fail-safe test every Cold Shutdown. Testing will be initiated when the ISI program is implemented.

4. There have been no instances in which water hammer or damage which may have been caused by water hammer has occurred in SDV related piping.

5. A review of administrative procedures, and instrument surveillance procedures applicable to the SDV level switches has shown that degradation of any switch due to a damaged float or other cause would be detected, and that inoperability of the rod block and scram switches from any cause would be reported to the NRC.

6. Functional tests of all of the SDV level switches are performed quarterly.