AUG 9 1973

Docket Nos. 50-10, 50-237, 50-249, 50-254, and 50-265

Commonwealth Edison Company ATTN: Mr. Byron Lee, Jr. Vice President Post Office Box 767 Chicago, Illinois 60690

Gentleada.

Your letter dated July 13, 1973, expressed concern regarding the capability of Quad-Cities Units 1 and 2 and Dresden Units 1, 2, and 3 to meet the Commission's new Appendix J to 10 CFR Part 50, effective March 16, 1973.

In reviewing your request for consideration of the applicability of the Appendix J to Quad-Cities Units 1 and 2 and Dresden Units 2 and 3, we find additional information, itemized below; is needed to complete our evaluation.

- Submit the Dresden 2/3 and Quad-Cities 1/2 Integrated Primary Containment Leak Test (IPCLT) Program for our review and evaluation. Include the following information:
 - a. The degree to which test methods follow ANSI N45.4-1972.
 - b. A description of the test methods used to detect penetration and isolation valve leakages. In the case of Dresden 2/3, list all the penetrations.
 - c. A description of the test data reduction methods, including the use of a least squares fit, of an upper bound 95% confidence limit, and how instrument errors are accounted for.
- The Dresden 2/3 (D 2/3) Technical Specifications (TS) and the Quad-Cities 1/2 (QC 1/2) TS state that only personnel airlock door seals shall be tested. The bases for the D 2/3 TS indicate

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that the inner door could not withstand accident pressure, even with an auxiliary stiffening structure such as a "strongback", in the reverse direction. QC 1/2 TS do not discuss chis in its bases. Provide the pressure that the air locks would be capable of safely withstanding using a device such as a strongback on the inner door. The TS for all four plants permit the inner door to be open during operation, thus the outer door and airlock would become part of the containment boundary in the unlikely event of an accident, yet the outer door and airlock do not receive accident pressure testing. Propose a test procedure for the complete airlock.

- 3. The main steam isolation valves (MSIV) for all four units are presently leak tested using TS 4.7.A.2.h(1) at 25 psig by pressurizing between the two MSIV in the same steam line. The inboard valve is being tested in the reverse direction at less than accident pressure and the outboard valve is tested in the flow direction but at less than accident pressure. The bases section of TS 4.7 does not provide the justification for this test pressure. Provide the basis for the MSIV test pressure and procedure.
- 4. The manually operated isolation values on the instrument lines carrying primary system fluid, which are normally open, need not be leak tested if the instrument lines meet all the following criteria:
 - s. The values are not required for an isolation function in the event of a LOCA.
 - b. The fluid carrying portion of the system remains within the primary or secondary containments.
 - c. The transducers or gauges at the fluid carrying terminations of the instrument lines would retain leak tight integrity even in the unlikely event of a DBA while experiencing the resultant accident conditions of pressure, temperature, and flow velocity.

Describe the design of the fluid carrying instrument lines indicating that the lines either meet the three criteria provided above or provide a leak test program for the values on the lines that perform an isolation function.

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Commonwealth Edison Company - 3 -

AUG # 1973

The above information is requested within 30 days of the date of this letter and should be submitted as one signed original and thirty-nine additional copies.

The Dresden 1 containment leak rate test program will be addressed in , separate letter.

Sincerely,

Original signed by Dennis L. Ziemann

Dennis L. Ziemann, Chief Operating Reactors Branch \$2 Directorate of Licensing

cc: Mr. Charles Whitmore President and Chairman Iowa-Illinois Gas and Electric Company 206 East Second Avenue Davenport, Iowa 52801

> John W. Rowe, Esquire Isham, Lincoln & Eeale Counselors at Law One First National Plaza Chicago, Illinois 60670

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