



Commonwealth Edison

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August 31, 1982

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

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
IE Bulletin No. 79-08 Item No. 6
Daily Position Verification of ECCS Valves
NRC Docket Nos. 50-257/249 and 50-254/265

- References (a): Cordell Reed letter to J. G. Keppler
dated April 27, 1979
- (b): Cordell Reed letter to T. A. Ippolito
dated August 3, 1979
- (c): J. G. Keppler letter to Byron Lee, Jr.
dated April 14, 1979
- (d): T. A. Ippolito letter to D. L. Peoples
dated March 10, 1980

Dear Mr. Keppler:

References (a) and (b) provided the Commonwealth Edison Company commitments concerning safety-related valve position verification in response to Reference (c) IE Bulletin No. 79-08 Item 6 for our Dresden and Quad Cities Stations. Subsequently, Reference (d) provided the results of the NRC Staff evaluation which concluded that our commitments satisfied the intent of IE Bulletin 79-08 for this Item 6.

In particular, we indicated that the positions of vital manual ECCS valves are controlled by the use and documentation of locks on the handwheels. Additionally, we committed to implement a procedure for daily verification that all accessible ECCS valves in the main flow paths are in their proper positions.

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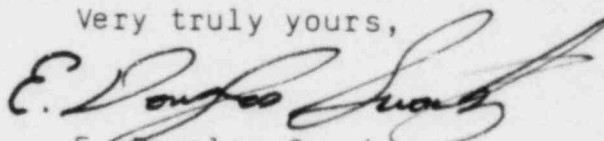
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Since the implementation of this procedure in 1979 at both Dresden and Quad Cities Stations, the daily valve position verification has never identified any locked manual ECCS valves as being out of proper position. For this reason, and the fact that the position of these valves is controlled by chains and padlocks, we believe that daily surveillances are no longer warranted in order to address the original NRC Staff concerns regarding valve position verification.

In view of the above, we feel that monthly verification is now a more appropriate response to IE Bulletin 79-08 Item 6 concerning manual ECCS valves. Therefore, we intend to reduce the frequency of position verification on locked, manual valves in the ECCS systems from once per day to once per month at our Dresden and Quad Cities Stations. Our current position verification practice on other valves in the ECCS systems will remain unchanged.

Please address any questions that you or your staff may have concerning this matter to this office.

Very truly yours,



E. Douglas Swartz
Nuclear Licensing Administrator

cc: Region III Inspector - Dresden
Region III Inspector - Quad Cities
Darrell G. Eisenhut - D/DL