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Docket No. 50-254
License No. DPR-29
NOED No. 94-3-006

Commonwealth Edison Company
ATTN: Mr. R. Pleniewicz
Site Vice President
Quad Cities Station
22712 206th Avenue North
Cordova, IL 61242-9740

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR COMMONWEALTH EDISON COMPANY
REGARDING QUAD CITIES NUCLEAR STATION, UNIT 1

Dear Mr. Pleniewicz:

By letter dated March 6, 1994, you requested the U. S. Nuclear Regulatory Commission (NRC) to exercise its discretion not to enforce compliance with the required action in Technical Specification (TS) 3.7.D. Your staff informed the NRC on March 5, 1994, that opening the Unit 1 reactor core isolation cooling (RCIC) steam line outboard isolation valve, 1-1301-17, to restore the availability of the Unit 1 RCIC system, will not meet TS 3.7.D requirement for primary containment isolation. The inboard valve, 1-1301-16, was declared inoperable on March 4, 1994, based on an Electric Power Research Institute (EPRI) and Commonwealth Edison engineering evaluation which indicated that the inboard valve would not completely close under full differential pressure conditions. Technical Specification 3.7.D allows continued power operation in the event that any isolation valve becomes inoperable provided that at least one valve in each line having an inoperable valve is in the isolated condition. As a result of leaving the RCIC steam line isolation valves open, Unit 1 would not be in compliance with TS 3.7.D. Your letter stated that the decision to restore the availability of Unit 1 RCIC system would have caused Quad Cities Unit 1 to enter TS 3.7.D Action Statement. Additionally, an initiation of an orderly shutdown of the reactor within 24 hours was required if TS 3.7.D cannot be satisfied. You requested enforcement discretion for a period of 8 days until March 13, 1994, when you will commence shutdown of Unit 1 for refueling.

You provided as justification for continued operation the extremely low probability of a break in the steam supply piping for the RCIC system occurring during the requested time frame, and other systems would be capable of preventing core uncover in case of a line break. You also described the net safety benefit of having RCIC available for use in other cases.

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In addition, you identified the following compensatory measures:

- Unit 1 RCIC outboard isolation valve (1-1301-17) and the motor operated valve (1-1301-61) downstream of the outboard valve will be closed in the event of an unisolated RCIC steam line break to reduce the differential pressure across 1-1301-16 to allow the valve to isolate the break.
- A caution card will be placed on the control switch for 1-1301-16 explaining that the valve may not close during a full differential pressure blowdown.
- No unnecessary work activities will be performed on Unit 1 RCIC.

We reviewed your justification for the requested enforcement discretion, including the compensatory measures identified. In addition, we considered the safety benefit of RCIC availability in event of an inadvertent Group I isolation. Based on the above, the staff agreed to grant enforcement discretion for an 8-day period. Therefore, this letter documents our verbal granting at 4:00 p.m. (CST) on March 5, 1994, of our intention to exercise discretion not to enforce compliance with TS 3.7.D for an 8-day period from March 5, 1994, until Unit 1 is shut down on March 13, 1994, to allow Commonwealth Edison to maintain system grid stability. However, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,

*Original Signed By
T. C. Martin*

for Edward G. Greenman, Director
Division of Reactor Projects

See Attached Distribution

See Attached Concurrences

yes.

RIII

RIII

NRR

RIII

RIII

Chyu

Hiland

Dyer

Clayton

*EM for
Greenman*

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In addition, you identified the following compensatory measures:

- Unit 1 RCIC outboard isolation valve (1-1301-17) and the motor operated valve (1-1301-61) downstream of the outboard valve will be closed in the event of an unisolated RCIC steam line break to reduce the differential pressure across 1-1301-16 to allow the valve to isolate the break.
- A caution card will be placed on the control switch for 3-1301-16 explaining that the valve may not close during a full differential pressure blowdown.
- No unnecessary work activities will be performed on Unit 1 RCIC.

We reviewed your justification for the requested enforcement discretion, including the compensatory measures identified. In addition, we considered the safety benefit of RCIC availability in event of an inadvertent Group I isolation. Based on the above, the staff agreed to grant enforcement discretion for an 8-day period. Therefore, this letter documents our verbal granting at 4:00 p.m. (CST) on March 5, 1994, of our intention to exercise discretion not to enforce compliance with TS 3.7.D for an 8-day period from March 5, 1994, until Unit 1 is shut down on March 13, 1994, to allow Commonwealth Edison to maintain system grid stability. However, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,

Edward G. Greenman, Director
Division of Reactor Projects

See Attached Distribution

RIII
RLW
for Chyu
3/8/94

RIII
RLW
Hiland
3/8/94

NRR
RLW
Dyer
via telecom
3/8/94

RIII *RLW*
Clayton
3/8/94

RIII
Greenman

cc:

L. DelGeorge, Vice President, Nuclear
Oversight & Regulatory Services
G. Campbell, Station Manager
N. Chrissotimos, Regulatory Assurance Supervisor
D. Farrar, Nuclear Regulatory Services
Manager
OC/LFDCB
Resident Inspectors, Quad Cities,
Dresden, LaSalle, Clinton
R. Hubbard
J. W. McCaffrey, Chief, Public
Utilities Division
Licensing Project Manager, NRR
State Liaison Officer
Chairman, Illinois Commerce Commission
J. B. Martin, RIII
H. J. Miller, RIII
L. A. Reyes, Acting ADPR/NRR
A. C. Thadani, ADT/NRR
J. W. Roe, DRPW/NRR
J. A. Zwolinski, ADR3/NRR
J. Lieberman, OE
Technical Assistant, Division of Reactor
Projects - I/II, NRR

bcc: PUBLIC - IE01