



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

April 1, 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 1 and 2
Quad Cities Station Units 1 & 2
Partial Response to Inspection
Reports 50-237/82-01, 50-249/82-01,
50-254/82-01 and 50-265/82-01
NRC Docket Nos. 50-237/249/254/265

Reference (a): C. E. Noreliu: letter to Cordell
Reed dated February 16, 1982.

Dear Mr. Keppler:

Reference (a) provided the results of a special inspection conducted by Mr. I. T. Yin of your office on January 4-7, 1982 at EDS Nuclear Inc., Walnut Creek, California, of activities at Dresden Units 2 and 3 and Quad Cities Units 1 and 2. The attachment to this letter provides the Commonwealth Edison Company response to the Notice of Violation items 1. (2) and 2. we expect to provide our response to the remaining item 1. (1) concerning I.E. Bulletin 79-14 suspension system operability by April 12, 1982.

The timeliness of our responses and the engineering details of the remaining response have been discussed with Mr. D. Danielson of your office on numerous occasions, including telephone discussions on March 2, 4, and 18, 1982. Because of the complexity of the issues involved, Mr. D. Danielson has agreed to our proposed extensions of the response dates.

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

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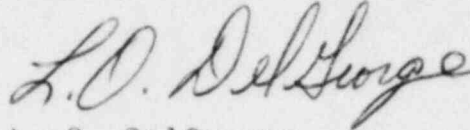
J. G. Keppler

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April 1, 1982

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

Very truly yours,

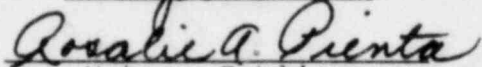


L. O. DelGeorge
Director of Nuclear Licensing

lm

cc: Region III Inspector - Dresden
Region III Inspector - Quad Cities

SUBSCRIBED and SWORN to
before me this 1st day
of April, 1982


Notary Public

3777N

COMMONWEALTH EDISON COMPANY

Dresden Station Units 2 and 3

Quad Cities Station Unit 1 and 2

Response to Notice of Violation

1. 10 CFR 50, Appendix B, Criterion V, states in part that, "Activities affecting quality shall be prescribed in documented instructions, procedures or drawings . . . and shall be accomplished in accordance with these instructions, procedures or drawings".

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations, Revision 9, dated July 16, 1979, states in Section 6, that "A document control system will be used to assure that documents such as specifications, procedures and drawings are reviewed for adequacy and approved for release by authorized personnel. Such documents will be distributed to and used at the locations where the prescribed activity is performed. Changes to these documents will be handled similarly and will be reviewed and approved, unless delegated by the originating organization to another responsible organization".

Contrary to the above, the EDS IE Bulletin 79-14 evaluation procedure did not specify that (2) safety relief valve thrust loads be included in the piping stress calculations.

Response:

Corrective Action Taken and Results Achieved and Corrective Action To Be Taken to Avoid Further Noncompliance.

CECO believes that omission of the safety relief valve discharge loads from the IE Bulletin 79-14 seismic analysis is not in violation of the intent of IE Bulletin 79-14. Relief valves were not considered in the original design because the loads were small enough so as to be insignificant compared to other loads. Therefore the 79-14 requirement to compare "as-built" to "as-designed" would exclude relief valve loadings.

To ensure a complete resolution of this issue, CECO instructed EDS Nuclear Inc. to perform an analysis to evaluate the impact of safety relief valve thrust loads on the 79-14 seismic analysis results. The results of this evaluation prove that the piping stresses and support loads due to the operation of these valves have negligible impact on the 79-14 results. This evaluation is documented in EDS calculation SC-13 Rev. 0.

Based upon the above, no changes will be made to the current analysis procedures.

Date When Full Compliance Will Be Achieved

Full Compliance has been achieved.

2. 10 CFR 50, Appendix B, Criterion V states in part that, "Activities affecting quality shall be prescribed in documented instructions, procedures, or drawings. . . and shall be accomplished in accordance with these instructions, procedures, or drawings.

Commonwealth Edison Company Topical Report CE-1-A, "Quality Assurance Program for Nuclear Generating Stations," Revision 15, dated January 2, 1981, states in Section 5 that "The quality assurance actions carried out for design, construction, testing, and operation activities will be described in documented instructions, procedures, drawings, specifications or checklists. These documents will assist personnel in assuring that important activities have been performed. These documents will also reference applicable acceptance criteria which must be satisfied to assure that the quality related activity has been properly carried out."

The Bechtel Power Corporation IE Bulletin 79-14 walkdown inspection procedure established for Dresden and Quad Cities requires that pipe whip restraint clearance should be measured in the same manner as for sleeves and penetrations, giving sufficient dimensions to locate the pipe position in the sleeve.

Contrary to the above, the pipe whip restraint gaps were not measured during the IE Bulletin 79-14 system walkdown inspection.

Response

Corrective Action Taken and Results Achieved and Corrective Action to Be Taken to Avoid Further Noncompliance

CECo believes that the absence of clearance information for pipe whip restraint number PWHP-2, a pipe whip restraint in Dresden Unit 2, is not a violation of the requirements of IE Bulletin 79-14. Specifically, the absence of or inclusion of clearances were the result of requirements as set forth in IE Bulletin 79-14 Supplement 2 dated September 7, 1979. These requirements specified insulation removal of obstructed pipe supports. CECo has complied with these requirements.

At the time of the walkdown, the subject whip restraint was covered with thermal insulation; this is documented on a markup of drawing no. ISI-203, sheet 2, which included a notation "Circ. of insulation 60 inches". Because the whip restraint ring O.D. is 14 1/4" (circumference of 44 3/4"), the insulation would have covered this whip restraint and clearances could not be measured due to insulation coverage. "The insulation type and outside circumference of the pipe plus insulation covering," was recorded as required by the procedure.

The intent of the walkdown procedure was not to remove insulation at each obstructed detail, and therefore some measurements, including clearances, could not be recorded. Paragraph IV J of the walkdown procedure required insulation removal of ". . . a minimum of 10% of obstructed pipe supports" (this is in conformance with IE Bulletin 79-14, Supplement 2, dated September 7, 1979). This requirement has been met. Therefore the insulation was not removed to measure clearances for this restraint.

It is acknowledged that if a whip restraint were to be overloaded in a seismic event it could break. This would, however, not affect the integrity of the piping system or its seismic hangers during the postulated event.

Based upon the above, the absence of clearance information for the subject whip restraint should not be considered a procedural breakdown. It is our contention that lack of clearance information does not constitute a violation of the walkdown procedures and therefore no corrective action will be taken.

Date when Full Compliance will Be Achieved

Full Compliance has been achieved.