



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

September 10, 1991

Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2  
Supplemental Response to Electrical  
Distribution System Functional Inspection (EDSFI)  
Report 50-254/91011, 50-265/91007  
NRC Docket Nos. 50-254 and 50-265

- References:
- (a) H.J. Miller letter dated June 24, 1991,  
transmitting NRC Inspection Report  
50-254/91011, 50-265/91007
  - (b) T.J. Kovach letter dated July 24, 1991,  
transmitting Commonwealth Edison Company's (CECo)  
response to Inspection Report 50-254/91011, 50-265/91007
  - (c) Conference Call between CEC Co (M. Richter, et. al.) and  
NRC Region III (D. Butler) on September 10, 1991

Dear Sirs:

Reference (a) transmitted the Inspection Report for the EDSFI performed at Quad Cities Station. CEC Co responded to the Inspection Report in Reference (b). Based on the Reference (c) teleconference, CEC Co agreed to the NRC's request to supplement the response to the cited deviation regarding breaker overduy concerns relative to the 4KV and 250V systems.

As indicated in the response to the deviation, CEC Co acknowledges the technical concerns associated with the deviation, and is taking comprehensive actions to address those concerns. This response was not intended to take exception to the deviation. As stated in the response, given the quality of documentation and uncertainty of the precise industry practice in place in 1967 (during the original licensing of the plant), considerable effort and resources would need to be expended to confirm this point with certainty. In light of our plans to address the technical concerns, CEC Co currently does not plan to pursue this confirmation.

If your staff has any questions or comments concerning this letter, please refer them to Rita Radtke, Compliance Engineer at (708) 515-7284.

Sincerely,

T.J. Kovach  
Nuclear Licensing Manager

cc: A. Bert Davis, Regional Administrator - RIII  
T. Taylor, Senior Resident Inspector - Quad Cities  
L. Olshan, NRR Project Manager  
D. Butler, RIII

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