



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

December 2, 1991

*Docket File*

Docket Nos. 50-254  
and 50-265

Mr. Thomas J. Kovach  
Nuclear Licensing Manager  
Commonwealth Edison Company-Suite 300  
OPUS West III  
1400 OPUS Place  
Downers Grove, Illinois 60515

Dear Mr. Kovach:

SUBJECT: SAFETY EVALUATION - INSERVICE TESTING (IST) PROGRAM RELIEF  
REQUEST, QUAD CITIES, UNITS 1 AND 2 (TAC NOS. 74788 AND 74789)

By letter dated July 2, 1990, you submitted Revision 3 of the Quad Cities Station Inservice Testing Program. Revision 3 incorporated NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." This submittal completed your response to GL 89-04 previously addressed in your letters dated October 2, 1989, and March 14, 1990. The staff has reviewed and evaluated the relief requests contained in the revision.

The enclosed Safety Evaluation (SE) was prepared by the NRC to provide the results of the staff review. The Code of Federal Regulations, 10 CFR 50.55a(g), requires certain Class 1, 2, and 3 pumps and valves in water-cooled nuclear power facilities to meet the inservice testing requirements stated in the ASME Boiler and Pressure Vessel Code (Code), Section XI; specifically, Subsection IWF, "Inservice Testing of Pumps in Nuclear Power Plants," and Subsection IWX, "Inservice Testing of Valves in Nuclear Power Plants." Guidance on acceptable alternatives to Code requirements has been provided for certain aspects of inservice testing by NRC in GL 89-04. Licensees with no Safety Evaluation issued or not planned for issuance in the near term, were requested to review their IST programs against the guidance provided and make revisions as necessary to address the NRC positions in GL 89-04.

The NRC staff has reviewed and evaluated your response to GL 89-04 and the revised IST program relief requests. Pursuant to 10 CFR 50.55a(a)(3)(i) and (ii) we are granting relief from the testing requirements which we have determined would be impractical to perform, where compliance would result in a hardship without a compensating increase in safety, and where the proposed alternative testing provides an acceptable level of quality and safety. We have made recommendations on relief requests which were preapproved by GL 89-04. An "Anomalies" section identifies items that you should address in a submittal within one year of the date of this SE. Relief requests applicable to non-Code components have not been evaluated.

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You are required to comply with the IST Program defined in Revision 3 where relief has been granted by GL 89-04 and the enclosed SE. IST Program changes such as additional relief requests or changes to approved relief requests should be submitted for staff review, but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in GL 89-04 should be submitted to the NRC staff, but can be implemented provided the guidance in GL 89-04, Section D, is followed. IST Program changes that involve additions or deletions of components from the IST Program should be provided to the NRC.

Sincerely,

**Original Signed By:**

Richard J. Barrett, Director  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosure:  
Safety Evaluation

cc w/enclosure:  
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Mr. Thomas J. Kovach  
Commonwealth Edison Company

Quad Cities Nuclear Power Station  
Unit Nos. 1 and 2

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QUAD CITIES STATION  
SE TABLE 1  
SUMMARY OF RELIEF REQUESTS

RELIEF REQUEST NUMBER	SE SECTION	SECTION XI REQUIREMENT & SUBJECT	EQUIPMENT IDENTIFICATION	ALTERNATE METHOD OF TESTING	ACTION BY USNRC
RP-00A	2.1	IWP-3100 Table IWP-3100-1 Vibration measurement	All IST pumps	Measure pump vibration velocity	Relief granted per (a)(3)(i) with exception and provision See Anomaly Item 1
RP-00B	N/A	IWP-3100 Table IWP-3100-1 Measure bearing temperature	All IST pumps	Bearing temperature will not be measured	Preapproved per GL 89-04 Relief not evaluated in SE
RP-00C	N/A	IWP-3230(c) Corrective action	All IST pumps	Requests not to establish new reference values when analysis performed as corrective action for degraded condition	Preapproved per GL 89-04 See Anomaly Item 2
RP-11A	N/A	IWP-3100 Table IWP-3100-1 Measure inlet pressure and differential pressure	SBLC Positive displacement pumps	Monitor discharge pressure rather than inlet and differential pressure	Preapproved per GL 89-04 Relief not evaluated in SE
RV-00A	N/A	IWV-3421 through IWV-3425 and IWV-3427(b) Leak tests	Containment isolation valves	Perform leak testing per Appendix J	Approved per GL 89-04, Position 10 See Anomaly Item 3

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RV-00B	N/A	IWV-3521 Test frequency	All excess flow check valves	Perform testing at refueling outage frequency	Preapproved per GL 89-04 Relief not evaluated in SE
RV-00C	N/A	IWV-3417(a) Compare stroke times to previous values	Rapid-Acting valves	Apply a limiting stroke time of 2 seconds	Approved per GL 89-04, Position 6 Relief not evaluated in SE
RV-00D	3.1	IWV-3417(a) Compare stroke times to previous value	Category A/B power operated valves	Compare stroke times to reference values	Relief granted per (a)(3)(i) with provision See Anomaly Item 4
RV-00E	N/A	IWV-3521 IWV-3522 Exercise procedure	Various check valves	Disassemble and inspect valves to verify full-stroke open capability	Approved per GL 89-04, Position 2 See Anomaly Item 5
RV-00F	3.2	IWV-3521 IWV-3522 Exercise procedure	Various check valves	Disassembly and inspect valves to verify closure capability	Interim relief granted per (g)(6)(i) See Anomaly Item 6
RV-00G	N/A	IWV-3417(b) IWV-3523 Corrective actions	All valves tested during cold shutdown	Not correct a degraded condition prior to startup if not required to meet TS LCOs	Withdrawn by licensee 7/31/91
RV-03A	N/A	IWV-3000 Test methods and frequency	Control Rod scram valves	Test per Generic Letter 89-04 guidance	Approved per GL 89-04, Position 7

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EV-11A	N/A	IWV-3521 Test frequency	SBLC check valves	Part-stroke exercise CSD full-stroke exercise RF outage	Preapproved per GL 89-04 Relief not evaluated in SE
RV-23A	N/A	IWV-3521 Test frequency	PCIVs in HPCI drain and exhaust lines	Exercise quarterly during HPCI pump tests without closure verification, exercise during RF with closure verification	Preapproved per GL 89-04 Relief not evaluated in SE
RV-30A	N/A	IWV-3411 IWV-3417(a) Test frequency and corrective action	Four ERVs one automatic relief valve in ADS (each unit)	(1) Test once every 6 months to reduce cycles on torus (2) not measure stroke-time and not take corrective action	Preapproved per GL 89-04 Relief not evaluated in SE
RV-30B	N/A	IWV-3513 Additional tests	Main Steam Safety Valves, Dual Safety/Relief Valve	Test one-half each RF outage not perform additional tests if setpoint found out-of-tolerance	Preapproved per GL 89-04 See Anomaly Item 7
RV-30C	N/A	IWV-3521 Test frequency	MS Safety/Relief Valve discharge line vacuum breakers	Test valves each RF outage and include in preventive maintenance program	Preapproved per GL 89-04 Relief not evaluated in SE

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RV-32A	N/A	IWV-3521 Test frequency	Reactor FW valves 0220-058A/B 0220-059A/B 0220-062A/B	Test valves each RF outage	Preapproved per GL 89-04 Relief not evaluated in SE