



50-254/265

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

November 1, 1995

Mr. D. L. Farrar  
Manager, Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III  
1400 OPUS Place, Suite 500  
Downers Grove, Illinois 60515

SUBJECT: RELIEF REQUESTS FOR REVISION 5 OF THE THIRD 10-YEAR INTERVAL  
INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES (TAC NOS. M92353  
AND M92354)

Dear Mr. Farrar:

By letter dated May 2, 1995, the Commonwealth Edison Company (ComEd, the licensee) submitted Revision 5 of the third 10-year interval inservice testing (IST) program and the associated requests for relief for pumps and valves at Quad Cities Nuclear Power Station, Units 1 and 2. The IST program covers the third 10-year interval from February 18, 1993, to February 17, 2003, for Unit 1 and March 10, 1993, to March 9, 2003, for Unit 2.

The IST program has been updated to the requirements of the 1989 Edition of Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) and changes were made by the licensee to the relief requests previously submitted for the program. These changes and the new relief requests are listed in Section 2 of the Executive Summary for the IST program (Attachment 1 of the licensee's May 2, 1995, letter). The previously submitted relief requests for the IST program were evaluated in the safety evaluation (SE) sent to the licensee in the staff's letter dated May 3, 1994. The staff's evaluations of the changes to the previously submitted requests and the new relief requests are contained in the enclosed SE. The IST program was submitted for review and evaluation of its compliance with the requirements of the 1989 Edition of Section XI of the ASME Code and the station Technical Specifications for both units.

The Code of Federal Regulations, 10 CFR 50.55a, requires that IST of certain ASME Code Class 1, 2, and 3 pumps and valves be performed in accordance with Section XI of the ASME Code and applicable addenda, except where relief has been requested and granted or proposed alternatives have been authorized by the Commission pursuant to 10 CFR 50.55a(f)(6)(i), (a)(3)(i), or (a)(3)(ii). In order to obtain authorization for relief, the licensee must demonstrate that: (1) conformance is impractical for its facility; (2) the proposed alternative provides an acceptable level of quality and safety; or (3) compliance would result in a hardship or unusual difficulty without a compensating increase in the level of quality and safety. Section 50.55a(f)(4)(iv) provides that inservice tests of pumps and valves may meet the requirements set forth in subsequent editions and addenda that are incorporated by reference in 10 CFR 50.55a(b), subject to the limitations and modifications listed, and subject to Commission approval.

Nuclear Regulatory Commission (NRC) guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," dated

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April 3, 1989, provided alternatives to the ASME Code requirements that have been determined to be acceptable to the staff and authorized the use of the alternatives in Positions 1, 2, 6, 7, 9, and 10 provided the licensee follow the guidance delineated in the applicable positions. When a proposed alternative is in accordance with GL 89-04 guidance and documented in the IST program, no further evaluation by the staff is required; however, implementation of the alternative is subject to a staff inspection.

Section 50.55a authorizes the Commission to grant relief from ASME Code requirements or to approve proposed alternatives upon making the necessary findings. The staff's findings, with respect to granting or not granting the relief requested or authorizing the proposed alternative as part of the licensee's IST program, are contained in the enclosed SE.

The IST relief requests that are granted, authorized, or approved are acceptable for implementation provided the NRC conclusions in Table 2 of the enclosed SE (i.e., licensee actions for Anomalies 2 and 3) are addressed within one year of the date of this letter or by the end of the next refueling outage, whichever is later, unless another period is specified. The granting of relief is based upon the fulfillment of any commitments made by the licensee in the basis for each relief request and the alternatives proposed. Where interim relief has been granted, the license should resolve the issues before the expiration of the interim period.

Program changes involving new or revised relief requests should not be implemented prior to approval by the NRC except if the relief is authorized by GL 89-04 as discussed above. New or revised relief requests that meet the positions in GL 89-04, Attachment 1, should be submitted to the NRC, but may be implemented provided the guidance in GL 89-04, Section D, is followed. Program changes that add or delete components from the IST program should also be periodically submitted to the NRC.

This completes the staff's review of Revision 5 of the third 10-year interval IST program for pumps and valves at Quad Cities, Units 1 and 2, under TAC Nos. M92353 and M92354, respectively.

Sincerely,

Original signed by:

Robert A. Capra, Director  
Project Directorate III-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

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Enclosure: 1) Safety Evaluation  
2) Attachment 1  
cc w/encl: see next page

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Quad Cities Nuclear Power Station  
Unit Nos. 1 and 2

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