

January 16, 1998

CAL No. RIII-98-001

Mr. Oliver D. Kingsley
President, Nuclear Generation Group
Commonwealth Edison Company
ATTN: Regulatory Services
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: CONFIRMATORY ACTION LETTER

Dear Mr. Kingsley:

The purpose of this letter is to confirm the actions ComEd will take to resolve 10 CFR 50, Appendix R safe shutdown issues at Quad Cities Nuclear Station, Units 1 and 2. On September 26, 1997, your staff identified that the post-fire safe shutdown procedures were inconsistent with the plant Safe Shutdown Analysis (SSA). The safe shutdown procedures were predicated on the presence of proper electrical circuit breaker coordination; however, the SSA had not been updated to incorporate fuse and/or breaker coordination for 480VAC, 250VDC and 125VDC shutdown loads. Your review concluded that this discrepancy adversely affected the ability to achieve safe shutdown conditions in the event of a fire. In response to this issue you elected to shut down Unit 2 and entered a 67-day Administrative Technical Requirement (ATR) for Unit 1. Subsequent to the management meeting held in the Region III Office on December 19, 1997, you shut down Unit 1 to further assess needed corrective actions.

Based on the telephone conversation between Mr. Ed Kraft of your staff and Mr. Jack Grobe of this office on January 15, 1998, and ComEd letters to the NRC dated January 2 and 10, 1998, we understand that you will take the following actions:

- (1) The Safe Shutdown Analysis (SSA) will be revised, reviewed, validated, and approved to assure that a fire in any plant area will not prevent the performance of necessary post-fire safe shutdown functions, and that these required functions will remain free of fire damage.
- (2) Safe shutdown procedures will be revised, reviewed, validated, and approved to implement the revised SSA. Operators and other required personnel will be trained in the use of the procedures.

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- (3) 10 CFR Part 50, Appendix R discrepancies that could affect the ability of the plant to be safely shut down in the event of a fire will be identified prior to restarting the Quad Cities Units. In addition, all discrepancies will be resolved to ensure Appendix R compliance. If areas of the plant will not be in compliance with 10 CFR 50, Appendix R, appropriate compensatory measures will be identified and implemented, and a plan and schedule for achieving compliance for each identified discrepancy will be provided to the NRC.
- (4) A project plan and schedule to accomplish items (1) to (3) above will be provided to the NRC by January 23, 1998.

Concerning item (1) above, should the revised SSA result in a change to the basis for a previously approved exemption from 10 CFR 50, Appendix R, or create an unreviewed safety question, those issues will be submitted to the NRC for review and approval. Further, I understand that Commonwealth Edison will meet with the NRC to discuss resolution of all of the above issues prior to restarting the Quad Cities units.

Nothing in this Confirmatory Action Letter is intended to preclude you from taking actions which you deem necessary to place the plant in a safe condition or maintain it in a safe condition in the event of changing conditions.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

- 1) Notify me immediately if your understanding differs from that set forth above;
- 2) Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change; and
- 3) Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licensee; nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and your response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Sincerely,

A. Bill Beach
Regional Administrator

Docket No. 50-254; 50-265
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