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October 1, 1986

Mr. J. A. Zwolinski, Director
BWR Project Directorate #1
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Quad Cities Station Units 1 and 2
Comments on BNL Draft Report on
Inter-System LOCA's
NRC Docket Nos. 50-254 and 50-265

Reference: July 18, 1986 letter from J. A. Zwolinski
to D. L. Farrar.

Dear Mr. Zwolinski:

The referenced letter requested our review and comments on the subject draft report on Inter-system LOCA's prepared by Brookhaven National Laboratory. The attachment to this letter provides our comments.

In general, we believe the Brookhaven work to be accurate and objective (assuming the incorporation of our attached comments). However, caution should be exercised in the use of historical experience. Maintenance and test procedures are plant specific. Industry awareness to the events cited in the report should reduce their probability of recurrence. It must be noted that several of the occurrences in fact demonstrated the plant personnel's abilities to recognize that something was wrong, and take corrective action. Commonwealth Edison is available and willing to assist Brookhaven in the analysis of these occurrences to assure correct failure data and fault free modeling.

If you have any questions regarding our comments or desire our further assistance, please contact this office.

Very truly yours,

J. R. Wojnarowski
Nuclear Licensing Administrator

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Attachment

cc: R. Bevan - NRR

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COMMENTS ON DRAFT LETTER REPORT FIN A-3829

INTERFACING SYSTEMS LOCA AT BWR'S

GENERIC ISSUE #105

MAY, 1986

<u>Page</u>	<u>Section</u>	
2-8	Table 2.1	Quad-Cities has a head spray steam condensing mode of RHR.
2-8	Table 2.1	Quad-Cities has two contaminated condensate storage tanks of 350,000 gallon capacity each.
A-46	A.3.1.1	Only the 1001-47 and 50 valves are interlocked CLOSED on reactor pressure. The 1001-43 valves may be opened with reactor pressure > 100 psig.
A-47	A.3.2.2	Relief valves in parallel with RV-22A and B are RV-166A and B with a one-inch line (not RV-165A and B with a four-inch line). Setpoint is 450 psig.
A-48	A.3.3.2	The vessel head spray line relief valve will be available due to the normal ~20% OPEN position of the 1001-58 control valve. The RHR heat exchangers relief valves are also available, although they are one-inch valves.
A-49	A.3.3.2	A resulting LOCA of sufficient size to affect the jet pump riser ΔP indication to isolate both recirculation loops is <u>extremely</u> unlikely. The low pressure pipe would break, the leakage would be past the check valve and two closed MO's, and still be large enough to affect jet pump riser ΔP ?
A-50	A.3.5.2	The two-inch relief valve is set at 475 psig, not 375 psig.
A-50	A.3.5.2	The vulnerable piping is from the unstream isolation valves back through to the stop check valves - 1402-8A and 8B - <u>not</u> the pump.
A-50	A.3.6.1	The HPCI injection line description should reflect addition of safe shutdown pump injection line. (Also change Figure A.3.d.)

- A-51 A.3.6.2 In order to have an interfacing LOCA, the feedwater check valves must fail in addition to the CLOSED MOV 2301-8 and check valve 2301-7.
- A-49 A.3.4.2 In order to have an interfacing LOCA, the feedwater check valves must fail as well as the check valve AO 1301-50 and normally CLOSED MOV 1301-49.
- A-56 Table A.3.1 Valve stroke operability, timing quarterly.
- A-56 Table A.3.1 Relief valve capacity: RV-44 (not 144), one and one-half inch at 150 psig. Delete the other four relief valves.
- A-57 Table A.3.2 Surveillance requirement for check valve is "None".

Add to relief valve capacity the RV 166A and 166B valves - one-inch at 450 psig and change RV-59 to one-inch at 408 psig.
- A-58 Table A.3.3 Add to relief valve capacity the RV 166A and 166B valves - one-inch at 450 psig and change RV-59 to one-inch at 408 psig.
- A-57, A-58,
A-59, A-60,
A-61, A-62,
A-63 Delete any "power failure position" indicating CLOSED for all check valves. Check valves respond to system process pressures - they don't "fail CLOSED".
- A-60 Table A.3.5 Surveillance requirement is refueling outage LLRT.
- A-61 Table A.3.6 Relief capacity: RV-28A and 28B, two-inch at 475 psig - not 375 psig.
- A-63 Surveillance requirement is refueling outage LLRT.