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Quad Cities Generating Station
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December 13, 1999

SVP-99-236

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

- Subject:** Request for Additional Information for Relief Request CR-25
- Reference:**
- (1) Letter from J.P. Dimmette, Jr. (ComEd) to U.S. NRC, SVP-99-170, "Relief Requests CR-25, CR-26, CR-27, CR-28, CR-30, PR-11, PR-12, and PR-13," dated August 13, 1999.
 - (2) Letter from R.M. Krich (ComEd) to U. S. NRC, Response to NRC Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment," dated November 12, 1998.

The purpose of this letter is to provide additional information requested by the NRC in support of the Reference 1 submittal regarding programmatic controls for implementation and inspection of coatings.

In Reference 2, Commonwealth Edison (ComEd) provided a response to NRC Generic Letter 98-04, "Potential for Degradation of the Emergency Core Cooling System and the Containment Spray System After a Loss-of-Coolant Accident Because of Construction and Protective Coating Deficiencies and Foreign Material in Containment" for each site. Attachment 5 of Reference 2 is the response for Quad Cities Nuclear Power Station, Units 1 and 2.

The information requested by the NRC is provided in the attachment to this letter. Additional information, on this topic, is contained in Attachment 5 of Reference 2.

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December 13, 1999
U.S. Nuclear Regulatory Commission
Page 2

Should you have any questions concerning this letter, please contact Mr. C.C. Peterson at (309) 654-2241, extension 3609.

Respectfully,



Joel P. Dimmette, Jr.
Site Vice President
Quad Cities Nuclear Power Station

Attachment A: Request for Additional Information for Relief Request CR-25

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

Attachment A
Request for Additional Information for Relief Request CR-25
Page 1 of 1

NRC Question:

Provide a description of the plant specific programs implemented to ensure that Service Level 1 protective coatings used inside the containment are maintained in compliance with applicable regulatory requirements.

Response:

Commonwealth Edison (ComEd) Company has implemented controls for the procurement, application, and maintenance of Service Level 1 protective coatings used inside the containment in a manner that is consistent with the licensing basis and regulatory requirements applicable to Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. The requirements of 10 CFR 50, Appendix B, are implemented through specification of appropriate technical and quality requirements for the Service Level 1 coatings program, which includes ongoing maintenance activities.

The QCNPS Updated Final Safety Analysis Report (UFSAR), Revision 4, Table 1.8-1, "Conformance to NRC Regulatory Guides," and our Quality Assurance Program Topical Report (QATR) CE-1A, Revision 65h, specifies that Service Level 1 coating conform to the guidance of NRC Regulatory guide (RB) 1.54, "Quality Assurance Requirements for Protective Coatings Applied to Water-Cooled Nuclear Power Plants," Revision 0, American National Standards Institute (ANSI) N101.4-1972, "Quality Assurance for Protective Coatings Applied to Nuclear Facilities," and ANSI N45.2-1971, "Quality Assurance Program Requirements for Nuclear Power Plants." The UFSAR does not make a commitment pertaining to tracking or monitoring of the Service Level 1 coatings. Adequate assurance that the applicable guidance for the procurement, application, inspection, and maintenance is currently provided by procedures and programmatic controls, approved under the ComEd Quality Assurance program. ComEd has used the guidance provided in Electric Power Research Institute (EPRI) Technical Report TR-109937, "Guidelines on Nuclear Safety-Related Coating," to develop a corporate procedure for performing coating inspections to meet the requirements of 10 CFR Part 50, Appendix B.