

Commonwealth Edison Company  
Quad Cities Generating Station  
22710 206th Avenue North  
Cordova, IL 61242-9740  
Tel 309-654-2241

**ComEd**

ESK-97-047

February 18, 1997

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2,  
Third Ten Year Interval Inspection Plan  
Relief Request CR-19, Revision 0  
NRC Docket No. 50-254 and 50-265

This letter transmits Relief Request CR-19, Revision 0, to the subject Inservice Inspection (ISI) Plan.

Relief is requested from immediate compliance with the repair and replacement requirements of Subsection IWE (IWL is not applicable to Quad Cities) of ASME Boiler and Pressure Vessel Code Section XI 1992 Edition with the 1992 Addenda. A copy of the proposed Relief Request is provided as an attachment to this letter.

If there are any questions concerning this matter, or need for further clarification, please contact Mr. Charles Peterson, Regulatory Affairs Manager, at (309) 654-2241, extension 3609.

Respectfully,

*E. S. Kraft, Jr.*  
E. S. Kraft, Jr.  
Site Vice President  
Quad Cities Station

Attachment: Relief Request CR-19, Revision 0

cc: A. B. Beach, Regional Administrator, Region III  
R. M. Pulsifer, Project Manager, NRR  
C. G. Miller, Senior Resident Inspector, Quad Cities  
D. C. Tubbs, MidAmerican Energy Company  
R. J. Singer, MidAmerican Energy Company  
F. A. Spangenburg, Regulatory Affairs Manager, Dresden  
Office of Nuclear Facility Safety, IDNS  
DCD License (both electronic and hard copies)  
Hartford Steam Boiler, Chicago Office  
ESK Letter File

*AD47*

030110

9703030495 970218  
PDR ADOCK 05000254  
Q PDR



**ATTACHMENT A (Page 1 of 3)**  
**RELIEF REQUEST NUMBER: CR - 19**

**COMPONENT IDENTIFICATION**

Code Class:	MC
References:	IWE-4000 IWA-4000
Examination Category:	E-A, E-B, E-C, E-D, E-F, E-G, and E-P
Item Numbers:	All Class MC components listed in Table IWE-2500-1
Description:	ASME Section XI Repair and Replacement Procedures For IWE Components
Units:	1 and 2
Component Numbers:	All Class MC Components Subject to Repair and Replacement Rules of IWA-4000

**CODE REQUIREMENT:**

10CFR50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable ASME Section XI repair and replacement requirements. Class CC (Subsection IWL) does not apply to Quad Cities Units 1 or 2.

Article IWE-4000 refers to Article IWA-4000 for Repair Procedures.

**BASIS FOR RELIEF**

Relief is requested from immediate compliance with the repair and replacement requirements of Subsection IWE (IWL is not applicable to Quad Cities). Pursuant to 10CFR50.55a(a)(3)(ii), relief is requested on the basis that the immediate compliance with the aforementioned requirements would result in unusual difficulty without a compensating increase in the level of quality and safety.

A revision to 10CFR50.55a was published on August 8, 1996, which endorses Subsections IWE and IWL of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda. This revision requires the completion of an expedited examination by September 9, 2001. However, in a letter to the Nuclear Energy Institute (NEI) dated November 6, 1996, the NRC staff clarifies that all repair and replacement activities within the scope of Subsections IWE and IWL which are conducted after September 9, 1996 must be conducted in accordance with the applicable rules of Subsections IWE and IWL of ASME Section XI, 1992 Edition and 1992 Addenda.

Immediate compliance with the repair and replacement rules of ASME Section XI, 1992 Edition and 1992 Addenda, for IWE components is impractical because substantial time and resources must be expended for the following major efforts:

**ATTACHMENT A (Page 2 of 3)**  
**RELIEF REQUEST NUMBER: CR - 19**

1. CONTAINMENT STRUCTURE COMPONENT CLASSIFICATION: The containment structures at Quad Cities Station were constructed to the rules of ASME Section III, 1965 Edition, Quality Group B. In order to comply with 10 CFR 50.55.a(g)(4)(v), it will be necessary to identify and reclassify all containment components to Class MC classification criteria. This effort will include the retrieval and review of all applicable fabrication and installation documentation, the development of a basis document to identify the correct classification boundaries, and the eventual development of an Inservice Inspection Program to govern all IWE-related activities at Quad Cities Station.
2. PROCEDURE REVISIONS: The requirements of IWE must be incorporated into applicable station procedures. The current Inservice Inspection Program, (which includes the repair and replacement program), for Quad Cities Station is currently based on the rules of ASME Section XI, 1989 Edition and only addresses the inservice inspection requirements for Class 1, 2, and 3 pressure retaining components and component supports. Therefore, various procedures that control Code repair and replacement activities must be revised to incorporate the unique requirements of Subsection IWE.
3. EXAMINER TRAINING AND CERTIFICATION: The unique examiner qualification required by Subsection IWE must be incorporated into the existing Commonwealth Edison (ComEd) training and certification program. The existing ComEd training and certification program only addresses the certification requirements for Class 1, 2, and 3 pressure retaining components and component supports. The ComEd training and certification program must be revised to incorporate the unique requirements of Subsection IWE.

Since the containment structures at Quad Cities Station were constructed to the rules of ASME Section III, Quality Group B, all repair and replacement activities conducted on these components have been subjected to ComEd Quality Assurance (QA) Program, which implements the requirements of 10CFR50, Appendix B. The ComEd QA Program requires repair and replacement activities to be conducted in accordance with the original design specifications using approved procedures. This approach assures applicable design bases are maintained. In addition, the containment structure integrity is verified by periodic pressure tests in accordance with 10 CFR 50, Appendix J. The application of the requirements of Subsection IWE-4000 imposes added administrative burden (such as the requirement for a repair/replacement plan and NIS-2 form) that does not provide a compensating increase in the level of quality or safety.

**PROPOSED ALTERNATIVE PROVISIONS**

Until December 31, 1997, repair and replacement activities conducted on Class MC containment structure components at Quad Cities Station will be performed in accordance with the existing ComEd QA program requirements. Compliance with ASME Section XI, 1992 Edition and 1992 Addenda, Subsections IWE-4000 will begin on January 1, 1998.

**ATTACHMENT A (Page 3 of 3)**  
**RELIEF REQUEST NUMBER: CR - 19**

**APPLICABLE TIME PERIOD**

Relief is requested for the third ten-year interval of the Inservice Inspection Program for Quad Cities Units 1 and 2 until December 31, 1997.