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Quad Cities Generating Station
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June 25, 1999

SVP-99-122

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: Regulatory Commitment Change Summary Report

Please find enclosed the "Regulatory Commitment Change Summary Report" for Quad Cities Nuclear Power Station.

This report contains summary information from June 1, 1998, through June 1, 1999. Revisions to docketed regulatory commitments were processed using the Nuclear Energy Institute (NEI) guidance for Managing Nuclear Regulatory Commission (NRC) Commitments, Revision 2, dated December 19, 1995.

Should you have any questions concerning this letter, please contact Mr. W. J. Beck at (309) 654-2241, extension 3100.

Respectfully,

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

Attachment

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

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PDR ADOCK 05000254
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Quad Cities Nuclear Power Station
Regulatory Commitment Change Summary Report
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Original Document:

LER 1-97-030

Subject of Change:

Extend due date from July 31, 1999 to July 15, 1999.

Original Commitment:

As a part of the IST Program Assessment and Revision effort that is currently on-going, one objective will be to establish a methodology (e.g. software or checklist) for ensuring adequate documentation that the program implementation meets the as committed ASME and/or OM requirements, and thus aid in the periodic verification of IST Program implementation. Due date July 31, 1998.

Revised Commitment: Approved July 28, 1998

Same as original commitment description except due date extended to July 15, 1999.

Basis:

Change improves IST programmatic controls. This effort is administrative in nature and does not affect component or system operation.

Status:

On schedule for completion.

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Original Document:

Quad Cities Station Diagnostic Evaluation Team (DET) Report Response
December 30, 1993

Subject of Change:

Deletion of commitment to replace Diesel Generator starting air skid copper tubing with stainless steel.

Original Commitment:

Replace starting air skid copper tubing with stainless steel.

Revised Commitment: Approved July 31, 1998

Delete regulatory commitment.

Basis:

Based on initial reviews, this was seen as a worthwhile enhancement due to industry experience, but was not required for compliance. This item will no longer be tracked as a regulatory commitment associated with the DET.

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Original Document:

NRC Inspection Report 98-201, Unresolved Item 201-02. Quad Cities Nuclear Power Station response, SVP 98-246, "NRC Inspection Report Numbers 50-254/98-201 and 50-265/98-201, " dated July 6, 1998.

Subject of Change:

Extend due date from August 14, 1998 to November 14, 1998.

Original Commitment:

Resolve issues and prepare closure package for URI 98-201-02, Ref. E1.2.1.2.b and LOCA Analysis input errors. Due date August 14, 1998.

Revised Commitment: Approved August 14, 1998

Same as original commitment description except due date extended to November 14, 1998.

Basis:

Nuclear Fuel Management will be performing the procedure revision to NEP 16-75 which will identify the responsibility of who will verify LOCA inputs in the future. This will not be done until September 16, 1998. LOCA inputs have been verified for Q1C16.

Status:

This item was completed on September 22, 1998.

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Original Document:

Appendix G Predecisional Enforcement Conference Commitment letter, SVP 98-019, "January 9, 1998 Pre-Decisional Enforcement Conference (Appendix G) Commitments made by Quad Cities Nuclear Power Station, " dated January 29, 1998.

Subject of Change:

Extend due date from September 1, 1998 to April 15, 1999.

Original Commitment:

Identified issues from the Quad Cities ISI Program assessments will be resolved prior to September 1, 1998.

Revised Commitment: Approved August 27, 1998

Identified issues from the Quad Cities ISI Program assessments will be resolved prior to April 15, 1999.

Basis:

Additional time is required to complete resolution using Managed Tasks and to address all issues within the context of a common approach across all ComEd sites. Efforts to meet original date were delayed in order to coordinate efforts.

Currently, the ISI program is in full compliance with ASME Section XI code requirements. The commitment date (April 15, 1999) will ensure that any additions to the ISI program inspection scope can be accomplished prior to the completion of Quad Cities' current inspection scope (March 10, 2000 & February 18, 2000 for Units 1 & 2, respectively). Open issues were scrutinized through the operability determination process in support of restart of both Units following resolution of Appendix R issues.

Status:

Quad Cities Nuclear Power Station letter SVP 99-019 "ISI Improvement Plan", dated February 11, 1999, extended this action to October 27, 1999. On schedule for completion.

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Original Document:

Appendix G Predecisional Enforcement Conference Commitment letter, SVP 98-019, "January 9, 1998 Pre-Decisional Enforcement Conference (Appendix G) Commitments made by Quad Cities Nuclear Power Station," dated January 29, 1998.

Subject of Change:

Extend due date from "prior to use or by September 1998, whichever occurs first," to "prior to use or by April 15, 1999, whichever occurs first."

Original Commitment:

All pressure testing procedures will be reviewed for omissions and errors prior to use or by September 1998, whichever occurs first.

Revised Commitment: Approved August 27, 1998

All pressure testing procedures will be reviewed for omissions and errors prior to use or by April 15, 1999, whichever occurs first.

Basis:

This commitment is approximately 60% complete (e.g., the class 1 and several class 2 systems are complete). Overall, the pressure test reviews are a sub-task of the overall ISI assessment resolution. Several of the outstanding issues involve definitional issues with Class 2/3 system boundaries. Additional time is required to complete resolution(s) using Managed Tasks and to address all issues within the context of a common approach across all ComEd sites. Efforts to meet original date were slowed in order to coordinate efforts across all sites.

As of August 27, 1998, all class 1 boundary pressure tests are current. Completion of the reviews/revisions to the Class 2/3 pressure test procedures will support completion of all tests to meet the end of period testing requirements (spring of the year 2000). In addition, most Class 2/3 pressure tests are conducted on-line (system operational pressure).

Status:

This item was completed on April 13, 1998.

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Original Document:

LER 1-98-008

Subject of Change:

Typographical error in the procedure identified to be revised and addition of two procedures that should have been identified in the original commitment.

Original Commitment:

Revise procedures QCMM 1530-08, -11 and -16 to include work instructions to have adequate clearances for installations with 1 inch clearance or less.
Due October 31, 1998.

Revised Commitment: Approved October 12, 1998

Revise procedures QCMM 1530-08, -11, QCMM 1500-16, -19, and 20 to include work instructions to have adequate clearances for installations with 1 inch clearance or less.
Due October 30, 1998.

Basis:

Although the original procedure number was incorrect (and two other procedures were not included), the intent of the original commitment will still be met.

Status:

This item was completed October 12, 1998.

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Original Document:

NRC meeting conducted on March 12, 1998.

Subject of Change:

Extend due date from Quad Cities Unit 1 Refueling Outage Q1R15 to Quad Cities Unit 1 Refueling Outage Q1R16.

Original Commitment:

Replace Unit 1 Drywell Cooling Fan Discharge Dampers during Q1R15.

Revised Commitment: Approved November 6, 1998

Dampers for Unit 1 Drywell Cooling Fans will be replaced during Q1R16 per Design Change Process 9800242.

Basis:

Commitment was made after Q1R15 Modification scope freeze milestone. There is insufficient time to develop and install this modification during Q1R15. As an interim measure, the degraded dampers for the 1F and 1G fans will be repaired during Q1R15. The repairs will clear temporary modification 97-2-111 which secures open the 1F and 1G dampers. The Unit 1 Drywell ventilation system is currently fully operable. Extending the deadline for this commitment will not affect system operability.

Status:

Degraded dampers for 1F and 1G fans were repaired during Q1R15. A modification has been approved for installation in Q1R16.

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Original Document:

LER 1-97-030

Subject of Change:

Change in minimum test pressure and elimination of the specific leakage requirement (0.3 gpm).

Original Commitment:

Corrective Actions Completed:

1. The operations procedures (QCOS 0201-7, "Reactor Vessel and Class 1 Systems 10-Year Hydrostatic Test for ISI" and QCOS 0201-8, "Reactor Vessel and Class One Piping Leak Test") have been revised to specify that the excess flow check valves are tested at 1005 psig (nominal pressure corresponding to 100% reactor power) or greater.
2. The instrument maintenance procedure (QCIS 0200-22, "Refuel Outage Reactor Vessel Excess Flow Check Valve Functional Test") has been revised to specify that the excess flow check valves are tested at 1005 psig (nominal pressure corresponding to 100% reactor power) or greater.

Corrective Actions to be Completed:

1. The instrument maintenance procedure (QCIS 0200-22, "Refuel Outage Reactor Vessel Excess Flow Check Valve Functional Test") will be revised to perform just-in-time training on the acceptance criteria (0.3 gpm at 1000 psig differential pressure) each time prior to performing this test. Due June 15, 1998

Revised Commitment: Approved November 23, 1998

1. The operations procedures (QCOS 0201-7, "Reactor Vessel and Class 1 Systems 10-Year Hydrostatic Test for ISI" and QCOS 0201-8, "Reactor Vessel and Class One Piping Leak Test") will be revised to specify that the excess flow check valves are tested at ≥ 600 psig.
2. The instrument maintenance procedure (QCIS 0200-22, "Refuel Outage Reactor Vessel Excess Flow Check Valve Functional Test") has been revised to specify that the excess flow check valves are tested at ≥ 600 .

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3. The instrument maintenance procedure (QCIS 0200-22, "Refuel Outage Reactor Vessel Excess Flow Check Valve Functional Test") will be revised to perform just-in-time training demonstrating the flow reduction on a known acceptable valve each time prior to performing this test.

Basis:

ComEd IST Program Technical Position Paper # TP-CWE-98-02, Revision 1, "Excess Flow Check Valve Testing, " dated November 4, 1998.

The Position Paper states:

- No leakage testing of excess flow check valves is required to meet IST and Appendix J requirements.
- Closure testing of excess flow check valves can be performed at all system pressures between 600 psig and the system design basis pressure. Acceptance criteria for the test shall be an audible click denoting valve closure or significant reduction in flow.

Status:

SVP Letter 98-375, "Change of 10CFR50.73 Reportability Status" dated January 21, 1999, retracted LER 1-97-030 and the commitments.

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Original Document:

Quad Cities Nuclear Power Station letter SVP 98-203, "Response to Questions Raised during Confirmatory Action Letter Closure Inspection and Summary of Fire Protection Compensatory Actions," dated May 22, 1998.

Subject of Change:

Identification and clarification of specific areas of the plant that are susceptible to the underlying issues identified in SVP 98-203 regarding Fire Watches.

Original Commitment:

Per SVP 98-203, Fire Watches were established in the areas listed in the following table as compensatory measures for actual and potential weaknesses in Quad Cities implementation of Appendix R safe shutdown requirements.

Issue/Commitment	Current Implementation	Applicable Fire Areas
<i>Station Blackout (SBO) Cable - Temporarily installed cable.</i> Once per hour fire watch; Heightened level of awareness.	1) Once per hour fire watch. 2) Heightened level of awareness.	13-1, 24-1, TB-IV
<i>Residual Heat Removal (RHR) Valve Hot Shorts.</i> Once per hour fire watch; Heightened level of awareness.	1) Once per hour fire watch. 2) Heightened level of awareness.	RB-1N, RB-1S, RB-2N, RB-2S, TB-I and TB-II
<i>High Pressure Coolant Injection (HPCI) Pump room penetration seals.</i> Once per hour fire watch; Heightened level of awareness.	1) Once per hour fire watch. 2) Heightened level of awareness.	RB-1N, RB-2S
<i>125 Vdc Issues.</i> Once per hour fire watch; Heightened level of awareness.	1) Once per hour fire watch. 2) Heightened level of awareness.	Specific areas are being identified. However, current fire watch program is providing a once per hour fire watch in the following power block fire areas: RB-1N, RB-1S, RB-2N, RB-2S, TB-I, TB-II, TB-III, TB-IV, TB-V, 13-1, 14-1, 23-1, and 24-1, RB1/2

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<p><i>Multiple Spurious Operations.</i> Once per hour fire watch; Heightened level of awareness.</p>	<p>1) Once per hour fire watch. 2) Heightened level of awareness.</p>	<p>Specific areas are being identified. However, current fire watch program is providing a once per hour fire watch in the following power block fire areas: RB-1N, RB-1S, RB-2N, RB-2S, TB-I, TB-II, TB-III, TB-IV, TB-V, 13-1, 14-1, 23-1, and 24-1, RB1/2.</p>
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Revised Commitment: Approved January 6, 1999

Issue/Commitment	Current Implementation	Applicable Fire Zones
<p><i>RHR Valve Hot Shorts.</i> Once per hour fire watch; Heightened level of awareness.</p>	<p>1) Once per hour fire watch. 2) Heightened level of awareness.</p>	<p>1.1.1.2, 1.1.1.3, 1.1.2.2, 1.1.2.3, 8.2.6.C, 6.3 (Nuclear Design Information Transmittal QDC-98-222)</p>
<p><i>HPCI Pump room penetration seals.</i> Once per hour fire watch; Heightened level of awareness.</p>	<p>1) Once per hour fire watch. 2) Heightened level of awareness.</p>	<p>11.1.3, 11.1.4 (Nuclear Design Information Transmittal QDC-98-222)</p>
<p><i>125 Vdc Issues.</i> Once per hour fire watch; Heightened level of awareness.</p>	<p>1) Once per hour fire watch. 2) Heightened level of awareness.</p>	<p>11.4.A, 11.4.B, 2.0, 3.0, 6.3, 8.2.1.A, 8.2.1.B, 8.2.2.A, 8.2.3.A, 8.2.4, 8.2.5, 8.2.6.A, 8.2.6.B, 8.2.6.C, 8.2.6.D, 8.2.6.E, 8.2.7.A, 8.2.7.B, 8.2.7.C, 8.2.7.D, 8.2.7.E, 8.2.8.A, 8.2.8.B, 8.2.8.C, 8.2.8.D (Nuclear Design Information Transmittal QDC-98-307)</p>
<p><i>Multiple Spurious Operations.</i> Once per hour fire watch; Heightened level of awareness.</p>	<p>1) Once per hour fire watch. 2) Heightened level of awareness.</p>	<p>1.1.1.2, 1.1.1.3, 1.1.2.2, 1.1.2.3, 6.3, 8.2.6.A, 8.2.6.C, 8.2.7.C, 8.2.7.A, 8.2.8.A, 8.2.8.B, 8.2.8.C, 8.2.8.D (Nuclear Design Information Transmittal QDC-98-222)</p>

Basis:

The current fire watches were implemented in response to questions raised during the Confirmatory Action Letter closure inspection by the NRC. At the time, all of the potential issues involving multiple spurious operations and 125 Vdc control power were not clearly identified. Therefore, fire watches were established in the power block as an interim measure to allow safe restart of both units. Since then, further investigation has allowed the identification of the specific areas of the plant that are susceptible to the underlying issues identified in SVP-98-203. The reduction in fire watches is a result of progress made in clearly identifying the specific vulnerabilities identified in SVP-98-203. Although this reduction is a change to the station's commitments, it does not represent a reduction in afforded safety or commitment to resolution of the underlying issues.

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Original Document:

Quad Cities Nuclear Power Station letters, ESK 97-115, "Individual Plant Examination of External Events - IPEEE, " dated May 30, 1997, SVP 97-234, "10 CFR 50, Appendix R, " dated October 31, 1997, and SVP 97-282, "10CFR50, Appendix R, " dated December 23, 1997

Subject of Change:

Removal of the Quick Response Team.

Original Commitment:

From ESK-97-115: A Quick Response Team (QRT) will be implemented to provide an immediate response and communication for fire alarms in high vulnerability areas by June 15, 1997. The team will be staffed such that it will not impact safe shutdown staffing.

From SVP-97-234: A dedicated, fully qualified 5-person fire brigade has been posted to provide a quick response to a fire. This 5-person fire brigade has replaced the previously committed 3-person quick response team.

From SVP-97-282: the original dedicated, fully qualified 5-person fire brigade ... has been replaced with the 3-person incipient fire quick response team as required by the operability evaluation.

Revised Commitment: Approved January 27, 1999

The Quick Response Team (QRT) is no longer in place.

Basis:

The QRT was implemented as a compensatory measure in June 1997. This compensatory measure was a result of Quad Cities IPEEE value of 5E-03 for fire risk. As part of Quad Cities Fire Protection Improvement Program, the Fire Risk model has been revised using more detailed cable routing information and eliminating gross assumptions. The results of the revised Fire Risk Model have produced a value of 6.6E-05. Since the risk due to a fire is more in line with industry values, this compensatory measure shall be eliminated.