



Commonwealth Edison
One First National Plaza, Chicago, Illinois
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April 5, 1979

Mr. James G. Keppler, Director
Directorate of Inspection and
Enforcement - Region III
U.S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Subject: Quad-Cities Station Unit 1
Response to IE Inspection Report
No. 50-254/79-08
NRC Docket No. 50-254

Reference (a): R. F. Heishman letter to Byron Lee, Jr.
dated March 23, 1979

Dear Mr. Keppler:

Reference (a) transmitted an inspection report regarding an inspection conducted by Messrs. L. A. Reyes and R. W. Dettenmeier of your office on February 16, 20-21, 28 and March 1, 1979 of activities at Quad-Cities Station Unit 1. Reference (a) indicated that certain of our activities appeared to be in noncompliance with NRC requirements. The items of noncompliance are addressed in the attachment to this letter.

Please address any additional questions that you might have concerning this matter to this office.

Very truly yours,

C. Reed

Cordell Reed
Assistant Vice-President

attachment

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Commonwealth Edison
Attachment
Response to Notice of Violation

NRC Docket No.
50-254

Items of Non-Compliance identified in Appendix A to the NRC letter dated March 23, 1979, are responded to in the following paragraphs.

1. Contrary to Technical Specification 3.7.2., and 10 CFR 50 Appendix B, Criterion XVII, sufficient records were not available to furnish evidence that containment integrity was established prior to increasing reactor water temperature above 212°F on February 26, 1979, in that test procedure 1-43 was not signed and dated or otherwise documented as having been completed.

Corrective Action Taken and Results Achieved

Special Test 1-43 was written for the purpose of follow-up to Work Request 963-79, which was issued to secure the drywell cooler dampers in the open position, and to close and cap-off the damper control sensing lines and valves at the drywell penetrations. This Work Request was documented as being complete prior to unit startup on February 26, 1979. The test was also written to provide for the taking of drywell temperature data subsequent to unit startup, so that the change to the drywell cooling dampers could be evaluated and adequate drywell cooling could be maintained. Moreover, this test was written so as to provide for a 10 CFR 50.59 review of our actions, and determine if an unreviewed safety question was involved. An unreviewed safety question was not found to exist, and the entire test package was On-Site Reviewed and approved by the Station Superintendent prior to unit startup. In accordance with the test procedure, the penetration isolation valves for the damper controls were verified closed, and the lines capped-off prior to unit startup on February 26, 1979. Although this was not documented, the Technical Staff Supervisor personally verified the penetrations to be isolated in accordance with the test procedure. Following the NRC exit interview, a document was added to Special Test 1-43 to show written evidence that the penetration isolation valves were in fact closed.

Corrective Action to be Taken to Avoid Further Non-Compliance

In the future, Special Tests will be written such that significant procedural steps are each verified to be completed, and dated; and that this verification be provided within the body of the procedure, or on a separate checklist.

Date When Full Compliance will be Achieved

Full compliance is achieved at this time.



2. Contrary to 10 CFR 50 Appendix B, Criterion V, procedure QTS 150-1, Revision 5, contained a valve lineup and references to drawings which did not reflect the correct usage of all primary containment penetrations and their associated isolation valves.

Corrective Action Taken and Results Achieved

Drawing Change Requests (DCR's) were initiated immediately following the inspection exit interview on March 1, 1979 to show the proper containment penetration and isolation valve arrangement on both units.

Drawings B-22, B-403, M-24 sheet 2, and M-71 sheet 2 were marked up to show the penetrations and valving for the drywell cooler damper control sensing lines. A copy of the filled-out and approved DCR form was provided to Region III on the next day.

Corrective Action to be Taken to Avoid Further Non-Compliance

On-Site Review 79-14 was conducted to cross-check the penetration schedule drawings, piping drawings, FSAR penetration listing, and in-plant penetration configuration. The review report contains an accurate penetration listing, and further Drawing Change Requests were initiated subsequent to this review.

Date When Full Compliance will be Achieved

Full compliance is achieved at this time.



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