



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

February 8, 1990

Mr. A. Bert Davis  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
799 Roosevelt Road  
Region III  
Glen Ellyn, IL 60137

Subject: Quad Cities Station Units 1 and 2  
Response to Inspection Report 50-254/89025  
and 50-265/89025  
NRC Docket No. 50-254 and 50-265

Reference: Letter from H.J. Milier to Cordell Reed  
dated January 10, 1990

Telephone Conversation between M. Phillips  
and P. Rescheske (NRC) and R. Stols (CECo)  
on January 30, 1990.

Mr. Davis:

The referenced letter transmitted the subject inspection report in which two Notice of Violations (NOV) were issued. The first NOV provided examples in which Quad Cities Station failed to report 10 CFR 50.59 evaluations during the period 1986-1988. The other NOV cited examples where the Quad Cities Station FSAR update for 1986 and 1987 failed to meet the requirements of 10 CFR 50.71. Attachment A provides Commonwealth Edison Company's (CECo) response to the NOV's. Commonwealth Edison understands the significance of the issues involved and the need for effective corrective actions.

A Rebaseline Program is being initiated for the Quad Cities Updated Final Safety Analysis Report. This program is comprehensive in upgrading the UFSAR to meet or exceed the regulatory requirements contained in 10 CFR 50.71. As requested in the referenced letter, the response to the NOV describes actions implemented in the interim prior to the completion of the Rebaseline Program. The response, however, does not provide the progress status for the Rebaseline program. At this time, Phase I of the Rebaseline Program is near completion and Commonwealth Edison would like to meet with your Staff in the near future to discuss the progress as well as the overall Rebaseline Program elements. This was confirmed to be acceptable in the referenced telephone conversation.

Finally, Attachment B provides a response to the Unresolved Item contained in the subject Inspection Report. Commonwealth Edison believes that the existing program meets the regulatory requirements and the need for the temporary waiver of compliance was related to personnel rather than programmatic issues.

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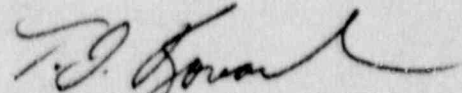
Mr. A. Bert Davis

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Please direct any questions or comments on the enclosed response to R. Stols at extension 7283.

Very truly yours,



T. J. Kovach  
Nuclear Licensing Manager

cc: L. Olshan, Project Manager  
Senior Resident Inspection, QC  
P. Rescheske  
M. Phillips  
J. Hind

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## ATTACHMENT A

### CECO RESPONSE TO NOTICE OF VIOLATION 50-254(265)/89025

1. 10 CFR 50.71(e)(4) requires that revisions to the FSAR be filed no less frequently than annually. 10 CFR 50.71(e)(2)(ii) requires that the submittal include an identification of changes made under 50.59 not previously submitted to the commission. 10 CFR 50.59(b)(2) requires that the licensee submit a report containing a brief description of any changes, including a summary of the safety evaluation of each. The report must be submitted annually.

Contrary to the above, the following examples were identified in the Revision 5 (dated November 20, 1987) and Revision 6 (dated July 27, 1988) updates to the Quad Cities UFSAR, to which the licensee failed to submit the required information or the submittal was not filed at the required frequency.

- a. Revision 5 to the UFSAR, dated November 20, 1987, was issued approximately five months late. Since Revision 4 was issued on June 30, 1986, Revision 5 was due June 30, 1987.
- b. UFSAR Section 2.8.e was changed in Revision 5 to reflect a modification to the Sodium Hypochlorite storage tank. A description of the change with the safety evaluation was not submitted to the NRC.
- c. UFSAR Section 7.9 was changed in Revision 5 to describe the new Rod Worth Minimizer System. A description of this change with the safety evaluation was not submitted to the NRC.
- d. UFSAR Section 10.3.3.1 was changed in Revision 6 to reflect a change in operating modes of the Reactor Water Cleanup System. A description of this change with the safety evaluation was not submitted to the NRC.
- f. UFSAR Table 7.7.2 was changed in Revision 5 to change the setpoint for drywell high radiation isolation from 2000 R/hr to 100 R/hr. A description of this change with the safety evaluation was not submitted to the NRC.

## DISCUSSION

Quad Cities Station concurs that 10 CFR 50.59 safety evaluations were not properly reported to the NRC prior to the Fall of 1988. The requirement to report safety evaluations was included in the Station Procedure for the preparation of the NRC Monthly Operating Report; however, there was no system established to assure that all the evaluations were properly communicated. In addition, the modification procedure did not specify at which step in the modification process the evaluation was required to be submitted to the Report.



Coordinator. The modification safety evaluations, therefore, had the potential of being forwarded to the Report Coordinator several months after the completion of the modification. This could result in the modification being reflected in the updated FSAR without reporting the conduct of the safety evaluation. There was also no systematic method to ensure that safety evaluations which did not involve modifications were properly reported in the monthly operating report.

The Station has developed a tracking system for all safety evaluations which are initiated by the Station. QAP 1100-12, Conduct of Safety Evaluations and 10 CFR 50.59 Reviews, requires that the Technical Staff clerk assign a sequential number to the safety evaluation and maintains a log of all safety evaluations conducted at the Station. The NRC Monthly Report Coordinator reviews the log to assure that safety evaluations are properly reported. Safety evaluations performed for modifications are submitted to the Monthly Report Coordinator per QAP 1270-S28, Station Modification Checklist for Release for Modification and Operability Testing, when the modification is declared operational. The procedure requires a signoff on the checklist to assure the safety evaluation is transmitted to the Report Coordinator. The implementation of these controls will ensure that all Station initiated evaluations and modification-related evaluations will be reported to the NRC in a complete and timely manner.

As indicated in the October 2, 1989 response to NRR, Commonwealth Edison believes that the late filing of the 1986 update to the FSAR was an isolated case due to inadequate turnover of Licensing Administrators. The investigation of the concerns identified by NRR in the June 7, 1989 letter revealed that the Station procedure for the annual update did not specify a time period for submitting the update to the Licensing Administrator. As a result, QTP 200-1 Annual Update of Final Safety Analysis was revised to require that the update be submitted to the Licensing Department at least thirty days prior to the required submittal date to allow sufficient lead time for review, reproduction and submittal to meet the annual filing date.

#### ACTIONS TAKEN TO CORRECT THE DEFICIENCY

A review of all safety evaluations performed during the period January 1, 1987 through December 31, 1988 was conducted to identify evaluations not previously communicated to the NRC. Safety evaluations not previously communicated to the NRC were submitted via letter from R. Stols to T. Murley on January 16, 1990.

#### CORRECTIVE ACTIONS TAKEN TO PREVENT FURTHER NONCOMPLIANCE

The procedure changes described in the discussion section were implemented prior to the inspection. No further corrective actions are necessary.

#### DATE WHEN FULL COMPLIANCE WAS ACHIEVED

Full compliance was achieved on January 16, 1990 when all safety evaluations from the period 1986-1988 were reported to the NRC.

2. 10 CFR 50.71(e) requires that the licensee periodically update the FSAR to assure that the information included in the FSAR contains the latest material developed. Further, the updated FSAR shall include all analysis of new safety issues performed by or on behalf of the licensee at Commission request. 10 CFR 50.71(e)(1) requires that the licensee submit revision on a replacement-page basis that is accompanied by a list which identifies the current pages of the FSAR following page replacement.

Contrary to the above, the following examples were identified in which the licensee failed to assure that Revisions 5 and 6 to the UFSAR contained the latest material developed, analysis of new safety issues, or list of current pages after page replacement.

- a. For UFSAR Revision 5 and 6, lists of current pages after replacement were not provided to the NRC for Figures and Appendices.
- b. The analysis of boraflex degradation of storage racks in the spent fuel pool that constituted configuration changes and reductions in the subcriticality margin were not incorporated into the UFSAR.
- c. UFSAR Figure 3.2.11 was replaced in Revision 5 with a new power-flow map. The discussion of the operating characteristics remained unchanged, with references to the previously used figure; and therefore, was inconsistent with the new figure.
- d. UFSAR Section 7.9 was changed in Revision 5 to reflect a new Rod Worth Minimizer System. Portions of the system description were not revised, and were inconsistent with the new system.
- e. UFSAR Table 5.2.5, Revision 6, indicated that the power to close valves 1601-21, 22, 23, 23, 56, and 60, was a spring; however, the actual closing power was air.

#### DISCUSSION

Following the receipt of the June 7, 1989 letter from NRR, Quad Cities Station and the Nuclear Licensing Department conducted a review of the NRC identified concerns. The root cause of the concerns can be attributed to inadequate procedures and inadequate training of the Technical Staff in the preparation of the FSAR updates.

The investigation of example (a) revealed that the complete table of contents for the UFSAR was deleted during the transition to word processing capability. Quad Cities Station believes that the omission was not identified since the procedure describing the program did not discuss the need for the complete table of contents. The cause of this omission was determined to be incomplete translation of the regulatory requirements into the Station Procedure. In addition, the procedure did not define minimum quality standards for the FSAR update.

The cause of example (b) can also be attributed to an inadequate procedure. The interpretation and definition of the regulatory requirement to include analyses of safety issues performed by the licensee at the Commission's request was not properly defined for implementation purposes. While the analysis of boraflex degradation was licensee initiated, Commonwealth Edison believes that the UFSAR text should have been revised to include the analysis. The root cause of the omission was again the absence of effective translation of the regulation into the Station Procedure. Guidance on the content for FSAR updates was not properly defined in the procedure.

Examples (c) and (d) were the result of inadequate review for administrative quality, i.e., assuring that the text was consistent with figures and/or the system. Quad Cities Station attributes these inconsistencies to inattention to detail when revising the text and the absence of a defined quality/editorial review.

Finally, as indicated in the response to Unresolved Item 234(265)/89012-3, the error in the description for the closure power for the 1602-21, 22, 23, 24, 56 and 60 valves was introduced in the original FSAR. The UFSAR process does not review the technical accuracy of information already contained in the FSAR or updated FSAR. The root cause for the introduction of this information in the original FSAR could not be determined.

#### ACTIONS TAKEN TO CORRECT THE DEFICIENCY

1. A complete table of contents is currently being developed and will be completed for the 1989 FSAR Update to be submitted by June 30, 1990.
2. The UFSAR was revised to correct the deficiencies identified in examples b through e. The revised sections were transmitted to the NRC via letter dated January 16, 1990 from R. Stols (CECo) to T.E. Murley (NRR).

#### CORRECTIVE ACTIONS TAKEN TO AVOID FURTHER NONCOMPLIANCE

1. The Station Procedure, QTP 200-1 "Annual Update of the Final Safety Analysis Report", will be revised to include the requirement for a complete Table of Content and a checklist describing elements which must be verified to assure the quality of the text. The procedure revision will be completed by March 31, 1990.



2. As indicated in the October 2, 1989 response, the Corporate Directive on FSAR requirements will be reviewed and revised to incorporate the guidance developed during Phase I of the Rebaseline Project. The guidance will define the information which is required to be included in the annual updates thereby assuring proper implementation of the regulations. The Corporate Directive revision is currently scheduled to be completed by March 31, 1990.
3. The Station Procedure, QTP 200-1, will be revised to include the information provided in the Corporate Directive. This will be accomplished by June 13, 1990.
4. Training in the revised Station Procedure and Corporate Directive will be conducted with members of the Technical Staff to ensure regulatory requirements are understood. The training will be completed by August 13, 1990.
5. Training on the UFSAR will be incorporated into the Technical Staff training program to ensure new members of the Technical Staff are aware of FSAR update requirements. This will be accomplished by March 9, 1990.
6. The Station Procedure will be revised to include a method for the identification and resolution of discrepancies contained in the UFSAR. This will provide for an effective system in tracking the identification and resolution of UFSAR discrepancies. Technical Staff will conduct a limited review of the current UFSAR to identify discrepancies contained in the UFSAR. The discrepancies found as a result of this limited review will be resolved either during the normal update process or the reformatting currently planned for 1990.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Examples b through e were completed in the UFSAR on January 16, 1990.

## ATTACHMENT B

### RESPONSE TO UNRESOLVED ITEM

#### UNRESOLVED ITEM 254(25)/89025-01

During the Unit 1 outage, the licensee completed three modifications affecting TS, and failed to obtain prior NRC approval in accordance with 10 CFR 50.59 (a)(1). By letter from R. Stols, CECO, to T.E. Murley, NRR, dated November 16, 1989, the licensee requested that a Temporary Waiver of Compliance from TS be granted to allow restart of the Unit. On November 20, 1989, the NRC granted a waiver of the TS affected by two of the modifications; the third modification only involved administrative TS and was not included in the waiver.

The safety evaluations for the Reactor Head Spray and CRD Return Line modifications were performed in accordance with CECO Quality Assurance Manual Q.P. 3-51, Form 3-51-2, and adequately justified that an unreviewed safety question was not involved. Form 3-51-3, revision dated May 1986, was a checklist required to be completed prior to installing the modifications. The checklist required NRC authorization for a facility change prior to installation when a TS change was involved. For the modifications described, NRC authorization was not requested, although a TS change was involved. The licensee had added a statement in the checklists for these modifications, implying that NRC authorization was not required since the intent of the TS was met. For the modification described in Paragraph c above, involving the relocation of drywell temperature indication, no reason was given for not requesting NRC authorization.

During review of this incident, the inspector noted that Form 3-51-3 had been revised in September, 1989. This revision implied that not all TS changes required NRC approval. However, 10 CFR 50.59(a)(1) states that NRC approval is required for all facility changes involving a change in the TS. The revision to the checklist and the justification for not requesting NRC approval for the modifications discussed above, appears to be contradictory to the requirements of 10 CFR 50.59. Discussions held with the licensee did not result in assurance that the licensee's program/procedures were adequate in the area of 10 CFR 50.59 reviews when a TS change was involved. Additional information is needed which should include a description of the licensee's program and procedures governing the 10 CFR 50.59 review process for changes involving TS, addressing the lines of responsibility and the review cycle for completing such a change.

No violations or deviations were identified; however, an unresolved item was identified in this area which requires further action on the part of the licensee and the NRC.



## DISCUSSION

Commonwealth Edison's governing procedure for the conduct of 10 CFR 50.59 evaluations of modifications which involve Technical Specification revisions is contained in the Corporate Quality Assurance Manual, specifically, Quality Procedure QP 3-51, "Design Control for Operations-Plant Modifications". QP 3-51 requires that the System Design Superintendent/Supervisor performs a Safety Evaluation utilizing Form QP 3-51-3, 10CFR50.59 Checklist for Facility Changes. The determination of the need for a Technical Specification revision is identified during this review. The System Design Superintendent/Supervisor transmits the 10 CFR 50.59 review along with other modification information to the Station Manager via a modification letter. This letter addresses whether the modification requires a Technical Specification change. The Station Manager is responsible for preparing the Technical Specification change and for obtaining on-site review and approval for the change. A copy of the on-site approved package is forwarded to Off-site Review which also performs a review of the Technical Specification change. Following the Off-site Review, the Nuclear Licensing Manager is required to submit and receive approval of the Technical Specification amendment.

The station is allowed to perform non-safety related modifications without Engineering's involvement; however, this type of modification would not typically encompass a Technical Specification change. To accomplish the 10 CFR 50.59 evaluation for the modification, the Technical Staff must complete QAP 1100-2, Conduct of Safety Evaluations and 10 CFR 50.59 Reviews, which requires a review for required Technical Specification revisions.

During the inspection, the NRC Inspector expressed a concern regarding QP Form 3-51-3 in that it contained the question "Does the Technical Specification change require NRC approval?". The inspector indicated that all Technical Specification revisions require NRC approval. Commonwealth Edison understands that prior NRC approval of a Technical Specification revision is required and, as indicated above, programmatic controls are in place to ensure that the revisions are applied for and received. A historical review of the revisions to QP Form 3-51-3 was conducted. In September, 1989, the Form was revised from "Is a change in the Technical Specification involved?" to "Does the Technical Specification require NRC approval?". The intent of the change was to distinguish between modifications which are not addressed by, or affecting, an existing Technical Specification and that may require a new Technical Specification to be added as compared with modifications which involve the revision of existing Technical Specifications. For cases involving the addition of new Technical Specifications, the Quality Assurance Program would allow the initiation of the work without prior NRC approval; however, the modified system could not be declared operational unless NRC approval of the additional Technical Specifications were received. Commonwealth Edison concurs that the form could be misconstrued to not require NRC approval; however, the text contained in the Quality Assurance Program clearly requires the NRC approval of the change. A note is included in the Quality Assurance Program to communicate the distinction. (REF: page 9 of 77, and 32 of 77 to QP 3-51) Commonwealth Edison acknowledges that the intent of the revision was not properly implemented into Form QP 3-51-3 since the question posed should always be answered "yes" and the desired distinction would not be made. A revision to the Quality Assurance Manual will be initiated to clarify the Program requirements.

The added statement in the checklist for the modifications involved in the waiver of compliance was not intended to imply that NRC authorization was not required for the Technical Specification. The intent of the statement was to allow the start of the modification without requiring prior approval of the Technical Specification since the modification was consistent with the intent of the existing Technical Specifications. Commonwealth Edison believes this practice is consistent with 10 CFR 50.59 requirements. Commonwealth Edison practice has been that modification work can be initiated without prior receipt of a related amendment if the equipment is not required to be operable for the condition of interest (e.g. in the shutdown or refuel mode) as specified in Technical Specifications. However, unless otherwise agreed upon with the NRC staff, Commonwealth has always required that related amendments be received prior to the modified equipment being declared operable.

Commonwealth Edison has always recognized that initiating work on a modification without prior NRC approval poses a licensee risk in that the system would have to be returned to its previous design if the NRC rejects the proposed Technical Specification amendment. Commonwealth Edison believes that the risk is diminished by ensuring communication with the NRC is established prior to and during the course of the modification and the review process of the amendment.

Finally, Commonwealth Edison believes that the need for a waiver of compliance was not indicative of a programmatic weakness but, rather, was a personnel error. The responsible Station personnel failed to implement the QA requirements in that the Technical Specification revisions were not prepared for NRC submittal in the early stages of the modification process. Commonwealth Edison believes that adequate controls are in place to assure that Technical Specification amendments are approved prior to declaring the modified system operational.