



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 29, 1993

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Document Control Desk

Subject: Quad Cities Nuclear Power Station Units 1 and 2
Response to Notice of Violation
Inspection Report Nos. 50-254/93005; 50-265/93005
NRC Docket Nos. 50-254 and 50-265

Reference: T. Martin letter to L. DelGeorge dated February
26, 1993 transmitting NRC Inspection Report
Nos. 50-254/93005; 50-265/93005

Enclosed is the Commonwealth Edison Company (CECo) response to the Notice of Violation (NOV) transmitted with the reference letter. The NOV cited three violations involving; 1) improper classifications 2) inadequate testing, and 3) inadequate maintenance on the HPCI check valves. CECOs response to the violations is provided in Attachment A.

If your staff has any questions or comments concerning this transmittal, please refer them to Marcia Jackson, Compliance Administrator at (708) 663-7285.

Sincerely,

D.L. Farrar
Regulatory Services Manager

Attachments

cc: A.B. Davis, Regional Administrator - Region III
J. Stang, Project Manager - NRR
T. Taylor, Senior Resident Inspector

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RESPONSE TO NOTICE OF VIOLATION
NRC INSPECTION REPORT
50-254/93005; 50-265//93005

VIOLATION: 254(265)/93005-1

10 CFR 50.55A Inservice Inspection Requirements requires, in part, that ASME Code Class 2 valves meet the requirements applicable to the Code. Subsection IWV (IWV-1100, Scope) of Section XI of the ASME Code requires, in part, that check valve safety function be identified.

Contrary to the above, as of February 9, 1993, the licensee failed to identify that check valves 1-2301-39 and 2-2301-39, the Unit 1 and Unit 2 HPCI suction check valves from the torus had a safety function in the closed direction.

This is a Severity Level IV Violation (Supplement I).

REASON FOR VIOLATION:

CECo acknowledges the violation. Our initial review of the HPCI system design basis did not identify that the 1(2)-2301-39 valves were required to maintain HPCI fill with suction from the Torus. This was not considered a safety function in the original plant design. CECo agrees that the close function of these valves are important to safety and should be tested by the IST Program.

The IST Program scope was substantially revised in 1991 in response to the guidelines of Generic Letter 89-04. A detailed review of each PI & D containing safety related equipment was performed and a safety function summary was prepared for each pump or valve with an identified safety function. The determination for a components safety function was based on a review of the Technical Specifications, UFSAR, DBA analysis, and other available design basis information. The conclusion that valve operation in the closed direction was not a safety function was based on the fact that the initial (preferred) source of water for HPCI is the Clean Condensate Storage Tanks.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Upon discovery that the HPCI discharge piping could not be vented per the requirements of Technical Specification 4.5.G.3 the HPCI system was declared inoperable and the appropriate Limiting Conditions for Operations followed. The 1(2)-2301-39 valves were disassembled, repaired and tested. The close function of each valve was tested by verifying the discharge piping could be filled and vented while the system was lined up to take a suction path from the torus.

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(Continued)

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED: (Continued)

A review of similar valves (i.e. check valves with only an identified "open" safety function) in the IST Program was conducted. The intent of this review was to identify any additional check valves that should be tested in the closed direction. Closure testing for several additional valves will be added to the IST Program as a result of this review. The review also determined that the closed function of the additional valves identified are adequately tested by existing procedures or routine operation.

CORRECTIVE ACTIONS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

A formal update to the IST Program will be submitted by September 30, 1993. The updated program will require safety function verification of the open and close functions of the 1(2)-2301-39 valves. Additionally, valves identified during the review of similar valves will be added to the program as appropriate.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved by September 30, 1993 with the update to the IST Program.

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NRC INSPECTION REPORT
50-254/93005; 50-265//93005

VIOLATION: 254(265)/93005-02

10 CFR 50, Appendix B, Criterion XI, Test Control requires, in part, that a test program be established to assure that all testing required to demonstrate that components will perform satisfactorily in service is identified and performed.

Contrary to the above, as of February 5, 1993, check valves 1-2301-39 and 2-2301-39, the Unit 1 and Unit 2 HPCI suction check valves from the torus were not tested to assure the valves performed satisfactorily in service.

This is a Severity Level IV Violation (Supplement 1)

RESPONSE:

CECo agrees that the HPCI 1(2)-2301-39 valves were not adequately tested in the closed direction. The failure to conduct this test is a direct result of the classification for these valves as discussed in the previous violation. Since no safety function in the closed direction was identified, no test was specified. As such, the corrective actions described in the violation response 254(265)/93005-01 will also preclude recurrence of this violation.

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VIOLATION: 254(265)93005-03

10 CFR 50, Appendix B, Criterion V, Instructions, Procedures and Drawings, requires, in part, that activities affecting quality be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances. In addition, instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria.

Contrary to the above, QCMMS 2300-1, "HPCI Torus Suction Check Valve (1(2)-2301-39) Disassembly and testing - Test Every Third Refueling Outage" Rev. 0", dated October 3, 1991, did not include appropriate quantitative or qualitative acceptance criteria to assure the check valves were adequately reassembled following maintenance.

This is a Severity Level IV Violation (Supplement 1).

REASON FOR VIOLATION:

CECo agrees that procedure QCMMS 2300-1 "HPCI Torus Suction Check Valve (1(2)-2301-39) Disassembly and Testing - Test Every Third Refueling Outage" Rev. 0 did not provide guidance to ensure the valves were properly seated. Again, this is a direct result of the classification of the valves as discussed in violation 254 (265)/93005-01. Since no safety function in the closed direction was identified, no test was specified. Since no test was specified, no acceptance criteria was needed.

CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED:

Upon discovery that the HPCI discharge piping could not be vented per the requirements of Technical Specification 4.5.G.3 the HPCI system was declared inoperable and the appropriate Limiting Conditions for Operations followed. The 1(2)-2301-39 valves were disassembled, repaired and tested. The close function of each valve was tested by verifying the discharge piping could be filled and vented while the system was lined up to take a suction path from the torus.

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CORRECTIVE ACTIONS THAT WILL BE TAKEN TO AVOID FURTHER VIOLATIONS:

Procedure QCMMS 2300-1 is currently being revised to include testing and acceptance criteria for the HPCI torus suction check valves 1(2)-2301-39 in the closed direction. The revision, validation, and approval will be completed by May 31, 1993.

CECo Engineering and Construction, Mechanical/Structural Design has provided Quad Cities station with technical evaluation and recommendation which address performance of seat and disc contact inspections for the check valve program. This information was used when revising QCMMS 2300-1.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Full compliance will be achieved in May 1993 with the approval of the revised QCMMS 2300-1 procedure.